

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

PAULA-CABRAL, ET.AL.

Defendants.

Docket No. 25-CR-10058-NMG

UNITED STATES OF AMERICA

v.

ELVIS TRUJILLO,
A/K/A “GORDO”, A/K/A “HONDURAS”

Defendant.

Docket No. 24-CR-10336-NMG

UNITED STATES OF AMERICA

v.

YEFERSON VALLECILLO CAMBAR,
A/K/A “ILLUMINATI”

Defendant.

Docket No. 24-CR-10335-NMG

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INTRODUCTION AND AGENT BACKGROUND

I, Special Agent Joseph Shapiro, having been sworn, state:

1. I am a Special Agent employed by the United States Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”). I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request such a warrant.

2. I am currently assigned to the Organized Crime Drug Enforcement Task Force (“OCDETF”) Strike Force at HSI Boston. Prior to being assigned as a Special Agent with HSI Boston, I was assigned as a Special Agent with HSI Newark, New Jersey, from in or around March 2019 until in or around November 2023. My last assignment with HSI Newark was in the Violent Crime and Gang Group conducting investigations into local and international violent criminal organizations. Prior to being employed as a Special Agent with HSI, I was employed as a Special Agent with the United States Secret Service (“USSS”) from in or around July 2016 until in or around March 2019. I also previously served in the United States Coast Guard (“USCG”) from 2006 to 2014, serving as a Maritime Enforcement Specialist trained to enforce federal laws

pertaining to migrant and drug interdiction. I have training and experience in conducting criminal investigations for violations of federal and state laws including, but not limited to, alien smuggling, document/benefit fraud, narcotics smuggling, child exploitation, weapons trafficking, complex financial crimes, and organized criminal activity.

3. I make this affidavit based upon personal knowledge derived from my participation in this investigation and upon information (whether received directly or indirectly) that I believe to be reliable from numerous sources including, but not limited to, the following:

- a. My training and experience investigating drug trafficking, violent crimes, and money laundering crimes;
- b. Oral reports, written reports, and documents that I have received from other federal, state, and local law enforcement agents;
- c. Physical and electronic surveillance conducted by me and other federal, state, and local law enforcement officers;
- d. Numerous confidential sources of information and cooperating witnesses;
- e. Public records;
- f. Business records;
- g. Telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- h. Precise location information for cellular telephones;
- i. Queries of law enforcement records and intelligence databases;
- j. Execution of search warrants;
- k. Social media postings, videos and images;
- l. Review of data and information obtained by Orders issued under 18 U.S.C. Section 2703(d), and Search Warrants;
- m. Review of cellular phones searched and seized during this investigation; and

i. Arrests of co-conspirators.

I. PURPOSE OF AFFIDAVIT

4. Because this affidavit is being submitted for the limited purpose of supporting the government's motion for detention under 18 U.S.C. § 3142, I have not included each and every fact known to me concerning this investigation nor every investigative technique utilized. Information derived from police reports, digital data and information from witnesses is summarized in this affidavit from the original documents and sources and is not necessarily recounted verbatim. All dates, times and amounts set forth in this affidavit are approximate. Additionally, a substantial portion of the text message conversations and recordings described in this affidavit are originally in Spanish. These Spanish conversations have been preliminarily translated by Spanish-speaking law enforcement personnel and linguists and any translations should be considered drafts and subject to review and refinement. Additionally, the investigation remains ongoing and numerous historical crimes taking place over the past decade, including multiple homicides, remain under investigation. The term "investigators" used in this affidavit refers to local, state and federal law enforcement officers.

II. THE TRINITARIOS CRIMINAL ENTERPRISE

5. I am currently participating in the investigation of the Trinitarios Criminal Enterprise ("Trinitarios") operating in the North Shore and Merrimack Valley of Massachusetts. HSI agents, FBI agents, and Task Force Officers ("TFO"), together with federal, state, and local law enforcement partners, are participating in **Operation Paper Machetes: Limelight**, which is an investigation that began in 2024 targeting the Trinitarios, a transnational criminal organization engaged in numerous acts of violence, murders, shootings, robberies, thefts, drug distribution, and other racketeering activity. The investigation began in the aftermath of four murders and a series

of attempted murders and shootings taking place in Lynn in 2023 that were committed by the Trinitarios.

A. THE ORIGIN, HISTORY, SYMBOLS, AND SLOGANS OF THE TRINITARIOS

6. The Trinitarios is a transnational criminal organization comprised of thousands of members throughout the United States, the Dominican Republic, various countries in South America and Europe. The organization was originally formed in the 1990s by Dominicans in the New York City jail at Rikers Island who were facing murder charges. The gang was formed to protect Dominicans from other gangs who had large populations in the prison system. The organization has developed a hierarchical leadership structure with positions that are known to exist at the state and local chapter level. Written literature and documents for the Trinitarios organization describes the organization, its history, its functions, the operating principles and the numerous rules and ideals that govern the Trinitarios.

7. The organization was named after three revolutionaries from the Dominican War for Independence. The Trinitarios is ethnically exclusive, and largely comprised of first and second-generation Dominican males. The Dominican War for Independence provides an underlying patriotic veneer to the gang's activities. The structure of the gang is historically linked to the nature of the "La Trinitaria" or the Secret Society of the Trinitarians that was utilized by the Dominican founding fathers to organize the resistance to Haitian occupation that preceded the Dominican War for Independence. Significant years and dates from the Dominican War for Independence provide symbolic meaning to the gang, such as 1838, 1844, and February 27.

8. Aspects of the "secret society" from the Dominican revolution were incorporated into the Trinitarios organization and its operations. For example, when members are initiated into the gang, the initiation takes place during a formal ceremony that occurs yearly on February 27, which is Dominican Independence Day. New initiates swear an oath to the organization and

secrecy. The new initiates are also provided with their “paperwork” documenting their membership, and through which they can prove their membership to others in the organization. The Trinitarios also employ a written “Magna Carta” that defines the structure and rules of the organization. There is a common slogan of “Dios, Patria, Libertad” or DPL, which stands for “God, Country, Liberty” (which invokes the Dominican independence movement of the late 19th century), as well as numerous internal symbols, ciphers, and phrases that membership and leadership use to communicate.

9. The Trinitarios have slogans, symbols, colors and practices that pervade the organization. There is a primary green logo for the Trinitarios that consists of two crossed machetes beneath a shield with the letters “DPL”, with the heraldic device and embellishments of “The Green Nation” and “Trinitarios Hasta La Muerte”, which translated from Spanish means, “Trinitarios Until Death.”



10. The Massachusetts Trinitarios have particularly embraced this logo and have created custom t-shirts bearing this logo and each member's gang name printed in green. The Massachusetts Trinitarios members have worn these shirts to their annual February 27 universal gathering and have filmed a music video where they can be observed wearing these custom t-shirts. A discussion of one such music video, still images from it, and other images and videos from February 27 gatherings are set forth later in this affidavit.

11. Trinitarios gang members also wear red, blue, and white, which are the colors of the Dominican flag. While the patriotic colors symbolize aspects of the gang's historical origins and ostensible patriotic purpose, lime green is the distinctive gang color used to distinguish the Trinitarios from other gangs. Lime green is the recognized color of the Trinitarios and was chosen to designate and separate the gang's colors from other major street gangs such as the Bloods that use red and Crips that use blue. This lime green color is reflected in bandanas and clothing worn by the Trinitarios members, and in social media postings. Other symbols of the Trinitarios include the sun, moon and stars, the "pineapple" emoji, and the "wolf" emoji. These symbols can be observed in tattoos obtained by Trinitarios members, and social media postings by members when referring to other gang members, or gang activity.

12. Trinitarios also make reference to other symbols, such as the Dominican Flag, the years of 1838 and 1844 (which are years significant to the Dominican revolution), and various ciphers, such as "157" (which references the first, fifth, and seventh tenants of their Magna Carta that are thought to be the three most important tenets), and "41612" (which refers to the 4th, 16th and 12th letters of the alphabet, that are "DPL", standing for Dios, Patria and Libertad). Trinitarios frequently obtain tattoos of these symbols and ciphers in order to demonstrate their allegiance to the gang.

13. Trinitarios members also “flash” the Trinitarios hand signs, with their thumb, index finger, and middle finger extended in recognition of the tripartite slogan of the Trinitarios: Dios, Patria, Libertad – DPL. Examples of this gang sign are seen in the following photograph:



14. In the photograph above, ANGEL SANTOS, JUSTIN ALBA, DARWIN BATISTA, ISRAEL GARCIA VASQUEZ, and other Trinitarios members can be observed throwing the gang sign and wearing the ceremonial Trinitario beaded necklaces.

15. Members are generally initiated into the gang after a period of observation or probation. Additionally, members often are inducted following the completion of a “mission”, which is generally a substantial act of violence such as a shooting. Upon induction a member is provided with their ceremonial “beads” that are placed on their neck by the ranking member presiding over the initiation ceremony. These beads are ceremonial, but extremely significant – they denote membership, and certain color beads also designate the individual holding a leadership position. Only Trinitario members who have been initiated into the gang may wear beaded necklaces. The wearing of a necklace by an individual who is not part of the gang would subject them to violence.

16. Necklaces comprised primarily of: green beads signify the Primera, or First in command; blue beads signify the Segundo or Second in command; red beads signify the Tercera or Third in command; and white beads signify the Disciplina or Disciplinarian. The historical purposes of these distinctive beaded necklaces are to designate and visually identify the members and leaders of the organization, without each member needing to know their name or have them identify themselves as being a member or holding a certain position. Numerous visual depictions of the Defendants charged in this case wearing these beaded necklaces, including leadership beads, are set forth in this Affidavit below. Furthermore, each inductee into the organization has a “440”, which is the individual who brings them into the gang, and who can verify a member’s status if questioned. The role of induction is significant and also derives from the organization’s revolutionary allusions. The name “La Trinitaria” alludes to the recruitment method, in which each member had the mission of recruiting three additional members.

17. Membership rates increased rapidly as members of the Trinitarios were released from prison and relocated outside of New York, establishing themselves within local communities.

According to documents obtained by investigators during the investigation, the Trinitarios are a hierarchical organization, and its members adhere to a code of conduct. At least one example of this written code was recovered during the investigation from the cellular phone of the State Leader, ENMANUEL PAULA-CABRAL, A/K/A “MANNY,” A/K/A “NELFEW,” A/K/A “FEW”, A/K/A “GORDO.” The investigation has since recovered multiple additional copies.

18. The Trinitarios also have an annual “universal” gathering on February 27 for all Trinitarios members from a particular state or area that celebrates Dominican independence. This meeting is extremely significant to the organization. During this “universal” meeting, new members are formally “blessed” into the organization during the swearing in ceremony, paperwork is awarded to the members, new members swear oaths that are administered by the State Supreme, and beaded necklaces are awarded to new members. For the Massachusetts Trinitarios, this meeting is usually held at a rented AirBnB and dozens of members attend.

19. In addition to the universal meetings where all members attend, individual Chapters of the Trinitarios hold their own meetings, referred to as an “11”. During these meetings, numerous points of business for the organization are discussed, including the status of the Chapter, developments regarding ongoing violence and rivalries, recent violent missions conducted by members, and the means of generating illicit income. Leaders and line members of the Chapter discuss these topics, and give speeches and toasts, and engage in coordinated chants.

B. THE STRUCTURE OF THE TRINITARIOS ENTERPRISE

20. The Trinitarios enterprise is hierarchical, with a top-down structure in each individual state and in each individual Chapter. Documents concerning the Trinitarios organization reference a “Central Command” of the Trinitarios that is known to be based in the Dominican Republic. However, there is not a significant amount of control from leaders located in the Dominican Republic being exerted over Trinitario operations in Massachusetts. Specifically, those

leaders — and even the founders — in the Dominican Republic do not exercise direct control over the State of Massachusetts or its constituent chapters. That being said, these leaders and founders still maintain a level of influence and their approval confers a level of respect and validation on the structure, decision-making, and criminal activity being undertaken by the Massachusetts Trinitarios and its Supreme, ENMANUEL PAULA-CABRAL. The investigation has developed extensive physical, digital, and documentary evidence related to the Trinitarios enterprise, its existence, its operations, its structure, its rules and policies, and its symbols and literature.

21. According to sources of information developed during the investigation, the Trinitarios are highly structured and hierarchical. In Massachusetts, there is a “Supreme,” who is the head of all the Trinitarios within the state and is responsible for the activities of the Trinitarios in Massachusetts, coordination with other state leaders and communication with leadership of the Trinitarios within the Dominican Republic. Below the Supreme, there is a position referred to as a “flag” which is only second to the Supreme within the state.

22. Within the state, there are multiple Chapters that are geographically centered in certain cities. Each individual Chapter has a “Cabinet” of leaders, consisting of: a “#1”, who is the leader of the Chapter; a “#2”, who is second in command; a “#3”, who is third in command, and other positions, such as the “Disciplina”, responsible for ensuring discipline among the membership, and the “Seguridad”, responsible for maintaining security of the chapter and serves as the enforcer against threats, and holds firearms at meeting. The Supreme of Massachusetts also determines the status of Chapters in the state, opening and closing Chapters, and appointing and removing people in leadership. I am also aware that the Supreme of Massachusetts is responsible for the Trinitarios Chapter operating in Manchester, New Hampshire and the Trinitarios located in Maine, where the gang operates a lucrative drug-trade.

23. These leadership positions are responsible for recruiting new members, providing discipline to members in violation of Trinitarios directives, and collecting money into a communal account called a “Fundo,” which is used to support illegal operations and provide money for incarcerated Trinitarios members and their families. Recent information revealed that the Trinitarios have undertaken steps to insulate leadership in a number of ways: first, by concealing the identities of the leaders, and status of members except on a need-to-know basis; second, by employing “flags” or cutouts who stand in the place of the leadership and deliver orders on their behalf. The use of cutouts permits the directives to be given by the leadership, while preventing the line members from identifying the leader, or directly attributing the orders (such as to retaliate or commit violence) to the actual leader himself, creating a layer of plausible deniability.

24. All members are required to provide money for the Fundo or Quota. This money is frequently generated through the importation and sale of illegal narcotics and firearms, as well as robberies, and other criminal activity, such as package thefts, identity theft, and check and credit fraud.

C. THE CRIMES OF THE TRINITARIOS

25. The Trinitarios criminal enterprise and its members do not hesitate to utilize violence. Numerous murders have been committed by Trinitarios members in furtherance of the organization’s goals and purposes.

26. Historically, there have been a number of very significant Trinitarios prosecutions in New York. Numerous murders have been charged against Trinitarios members and individual “sets” or Chapters of the Trinitarios. This includes the murder of teenage boy with a machete in a

convenience store that was captured on video.¹ Federal prosecutions by the U.S. Attorney's Office for the Southern District of New York include: the Bronx Trinitarios Gang or "BTG" Set,² the "Sunset Trinitarios" Set,³ the Own Every Dollar or "OED" Set,⁴ and the Trinitarios criminal enterprise as a whole.⁵ These historical New York cases include allegations of multiple murders that were committed by members of the Trinitarios Enterprise.

27. Additionally, the former national leader of the Trinitarios, Leonides Sierra, a/k/a "Junior" was convicted and sentenced in 2014 of racketeering conspiracy in the Southern District of New York, for offenses committed while serving a New York state prison sentence for murder. For example, while in state prison, Sierra organized a central committee to convey his orders to

¹ Thirteen Trinitarios were charged with participating in this murder to varying degrees. See Crane-Newman, Molly; McShane, Larry (14 June 2019). "Verdict in Lesandro 'Junior' Guzman-Feliz trial: All five defendants found guilty of first-degree murder in case that broke city's heart". New York Daily News. Tribune Publishing Company, retrieved 14 June 2019; and see *Trinitarios Gang Member Pleads Guilty To Fatal Stabbing Of Lesandro "Junior" Guzman-Feliz*, Bronx District Attorney, Press Release Dec. 13, 2022, available at <https://www.bronxda.nyc.gov/downloads/pdf/pr/2022/111-2022%20trinitarios-gang-member-pleads-guilty-junior-fatal-stabbing-bronx.pdf> (retrieved January 21, 2025).

² See *United States v. Sierra, et. al.*, Docket No. 11-CR-1032 (S.D.N.Y.), and <https://www.justice.gov/archive/usao/nys/pressreleases/December12/TrinitariosTkdwII.html>.

³ See *United States v. Santana, et. al.* Docket No. 20-CR-022 (S.D.N.Y.), and <https://www.justice.gov/usao-sdny/pr/leader-sunset-trinitarios-sentenced-life-prison-racketeering-including-ordering>

⁴ See *United States v. Nunez, et. al.*, Docket No. 22-CR-293 (S.D.N.Y.), and <https://www.justice.gov/usao-sdny/pr/sixteen-members-own-every-dollar-gang-charged-manhattan-federal-court-racketeering-and>.

⁵ See *United States v. Jones, et. al.*, Docket No. 22-CR-505 (S.D.N.Y.), <https://www.justice.gov/usao-sdny/pr/trinitarios-gang-leader-sentenced-life-prison-murdering-confidential-informant>

the street and conspired to murder an individual who refused to acknowledge his position as Supreme Leader.⁶

D. MASSACHUSETTS TRINITARIOS

28. Chapters of the Trinitarios within Massachusetts have been identified as being located in Lawrence, Lynn, Boston, and Haverhill. Trinitarios members within these cities undertake efforts to dominate their communities by intimidating rival gangs, and establishing control over certain neighborhoods, and standing out in areas to claim the locations where the Trinitarios reside and frequent as their territory. Multiple Trinitarios Chapters also exist within Massachusetts correctional facilities such as the Essex County House of Corrections – Middleton; Souza-Baranowski Correctional Center, Massachusetts Correctional Institution - Concord, and Massachusetts Correctional Institution – Shirley.

29. The Lawrence Chapter is believed to have over forty members. The territory of the Lawrence Chapter is known to be in the area of the 700 block of the Essex Street housing projects in Lawrence. The rival gangs of the Lawrence Chapter of the Trinitarios are the Gangster Disciples (referred to as the “GDs”) and Shotgun Crips. A prior federal investigation dubbed Operation Emerald Crush targeted members of the Lawrence Chapter of the Trinitarios for drug and firearm offenses. *See United States v. Emilio Rodriguez, et. al.*, Docket No. 19-CR-10430-LTS, ECF #12 (Affidavit filed in support of detention).⁷

⁶ See “National Leader Of “Trinitarios” Gang Sentenced In Manhattan Federal Court To 19 Years In Prison,” U.S. Attorney’s Office for Southern District of New York, Press Release (July 24, 2014), available <https://www.justice.gov/usao-sdny/pr/national-leader-trinitarios-gang-sentenced-manhattan-federal-court-19-years-prison> (retrieved on January 21, 2025).

⁷ As part of that case, twenty-one members of the Lawrence Chapter of the Trinitarios were charged in state and federal court. Historical acts of violence committed by members of the Lawrence Chapter are also discussed in the detention affidavit for that case.

30. The Lynn Chapter is believed to have dozens of members. The territory of the Lynn Trinitarios is in the area of 53 Smith Street and a parking lot by the beach that is referred to as La Cava or the Cave. The rival gangs of the Lynn Chapter of the Trinitarios are the Tiny Rascal Gangsters (referred to as “TRG”), Little Crip Gangsters (referred to as “LCG”) and Westside World (referred to as “WSW”). The Trinitarios view TRG, LCG and WSW as a collective opposition and generally speaking do not distinguish between members of these groups. All three rival gangs are considered to be aligned as a common enemy in the eyes of the Trinitarios.

31. These gang rivalries develop through personal enmity and disrespect between members of the rival gangs (either in person or over the internet), competition over drug territory and customers and violent acts, such as robberies, shootings and murders, that have been committed by the gangs against each other in the past. As noted below, and throughout this affidavit, these rivalries have become deadly and multiple murders have been committed by Trinitarios gang members.

32. The Trinitarios also undertake extensive efforts to recruit new members among communities of legal immigrants and illegal aliens from the Dominican Republic. The Trinitarios use a common Spanish language and culture, appearance of prosperity and brotherhood, and appeals to Dominican patriotism to ingratiate themselves to new members. These efforts are not directed exclusively towards adults. In fact, these recruitment efforts commence among juvenile members, and are particularly common in local high schools in Lawrence and Lynn. The Trinitarios generally appeal to the young males of Dominican background, while the rival gangs emphasize other ethnicities. Young members of the Lynn Chapter, for example, were called the “menores” and would undergo a multi-year process prior to becoming a full Trinitario member. The “menores” would be tasked with lesser roles during many of the recent violent “missions”

undertaken by the Trinitarios. These lesser roles include standing lookout during a shooting, holding or concealing weapons on behalf of full members and transporting weapons after their use in shootings.

33. The “menores” themselves were required to engage in fist fights with rival gang members that were the same age or stature. This investigation has led to the recovery of multiple videos that depict numerous fights and beatings taking place among high-school age Trinitarios targeting other students. Many such videos appear to take place on school grounds or right after school release. Significantly, two juvenile members of the gang are charged with participating in the September 2, 2023, double murder described below. CARLOS CORNIELLE RAMIREZ was fifteen-years-old and LEONARDO ESPINOZA was fourteen-years-old at the time of their participation in the September 2, 2023, double murder described below.

E. THE CRIMES OF THE TRINITARIOS IN MASSACHUSETTS

34. For their part, the Massachusetts Trinitarios have also committed numerous murders over the past decade. To date, the investigation has identified over twelve (12) homicides in Essex County, Massachusetts for which the Trinitarios are believed to be responsible. Some of these historical homicides and offenses have been individually charged by the Essex County District Attorney’s Office and have been tried to verdicts. In addition to the twelve identified homicides, the Trinitarios are believed to be responsible for numerous attempted murders, shootings, kidnappings, and robberies, a small number of which are described in this affidavit.

35. I am aware through review of court papers and police reports that multiple murders committed by Trinitario members have been investigated by the Massachusetts State Police, and local police departments, and prosecuted in Massachusetts State Courts by the Essex County District Attorney’s Office. Among those murders that are pending, or have been successfully prosecuted to guilty verdicts are the following:

- a. The March 8, 2017, Murder of Juan Espinal in Lawrence, Massachusetts. As part of this federal investigation, ELVIS TRUJILLO and ROBERT SEVERINO were charged with participating in the murder of Juan Espinal. TRUJILLO and SEVERINO are members of the Lawrence Chapter of the Trinitarios. TRUJILLO is charged federally with racketeering conspiracy and SEVERINO is charged in state court with this murder. *See United States v. Elvis Trujillo*, Docket No. 24-10336-NMG; *Commonwealth v. Robert Severino*, Essex Superior Court, Docket No. 2477CR00493.⁸
- b. The April 16, 2017, Murder of Aracelys Valdez in Lawrence, Massachusetts. I am aware that Luis Rodriguez, a member of the Lawrence Chapter of the Trinitarios, was charged with the murder of Aracelys Valdez and convicted of murder after a jury trial in Essex Superior Court on May 11, 2023. *See Commonwealth v. Luis Rodriguez*, Essex Superior Court, Docket No. 1777CR00306.
- c. The July 30, 2017, Murder of Jensey Hernandez, in Lawrence, Massachusetts. I am aware that Jeffrey Tapia, a member of the Lawrence Chapter of the Trinitarios, was charged with murder of Jensey Hernandez and convicted of murder after a jury trial in Essex Superior Court on June 29, 2022. *See Commonwealth v. Jeffrey Tapia*, Essex Superior Court, Docket No. 1777CR00599.
- d. The November 26, 2017, Murder of Mindy Tran in Lawrence, Massachusetts. As part of this federal investigation, ELVIS TRUJILLO is charged with participating in the murder of Mindy Tran. *See United States v. Elvis Trujillo*,

⁸ ELVIS TRUJILLO, A/K/A “GORDO”, A/K/A “HONDURAS” (“TRUJILLO”) is charged separately with Conspiracy to Conduct Enterprise Affairs Through a Pattern of Racketeering Activity (also known as “Racketeering Conspiracy” or “RICO Conspiracy”), in violation of 18 U.S.C. § 1962(d). As part of that Indictment, TRUJILLO is alleged to have participated in the March 8, 2017, murder of Juan Espinal, in Lawrence, Massachusetts, and the November 26, 2017, murder of Mindy Tran, in Lawrence, Massachusetts. In approximately 2022, TRUJILLO agreed to deportation to his native Honduras following other state court firearms convictions. Multiple cooperating witnesses informed investigators that TRUJILLO agreed to deportation to avoid charges related to the Tran homicide. On or about December 22, 2024, TRUJILLO was arrested in Honduras on a provisional arrest warrant issued by Honduras authorities to facilitate his extradition to the United States in order to answer to this Indictment. Additionally, I am aware that as part of this investigation, a Trinitario named ROBERT SEVERINO, A/K/A “PETETE” has also been charged with participating in the murder of Juan Espinal in Essex Superior Court (*Commonwealth v. Robert Severino*, Essex Superior Court, Docket No. 2477CR00493). I am aware that at the time of the murder of Juan Espinal, SEVERINO was seventeen years old.

Docket No. 24-10336-NMG. As noted above, TRUJILLO was a member of the Lawrence Chapter of the Trinitarios at the time of the murder.

- e. The May 17, 2018, Murder of Nike Colon, in Haverhill, Massachusetts. I am aware that Eddy Almonte, a member of the Lawrence Chapter of the Trinitarios, was charged with the murder of Nike Colon and convicted, following a plea of guilty in Essex Superior Court on September 21, 2022. *See Commonwealth v. Eddy Almonte*, Essex Superior Court, Docket No. 1877CR00389.
- f. The September 3, 2018, Murder of Jathien Amador, a/k/a “Jay EBK” in Lawrence, Massachusetts. I am aware of information that Jathien Amador was murdered by members of the Trinitarios and GDs, and that Trinitarios members have taken credit for his murder. In particular, Amador is believed to have been a member of the Shotgun Crips, a rival gang of the Lawrence Trinitarios.
- g. The March 30, 2022, Murder of Carlos Rivera in Lawrence, Massachusetts. I am aware that this homicide remains uncharged and unsolved. This murder has been claimed by Trinitario members.
- h. The May 14, 2021, Murder of Edward Javier in Lawrence, Massachusetts. I am aware that Adrian Corniel De La Cruz, a member of the Lawrence Chapter of the Trinitarios was charged with the murder of Edward Javier and convicted, following a plea of guilty in Essex Superior Court on September 25, 2024. *See Commonwealth v. Adrian Corniel De La Cruz*, Essex Superior Court, Docket No. 2177CR00297.
- i. The February 17, 2022, Murder of Ewdy Lopez, a/k/a “Timmy Brook” in Lawrence, Massachusetts. I am aware that Yanuel Mejia, a/k/a “Nano,” a member of the Lawrence Chapter of the Trinitarios was charged with the murder of Ewdy Lopez in Essex Superior Court, Docket No. 2277CR00147. This case is pending with no scheduled trial date.
- j. The September 2, 2023, Murders of Jandriel Heredia and Abraham Diaz in Lynn, Massachusetts. As part of the federal investigation, ENMANUEL PAULA-CABRAL, JUSTIN ALBA, TOMY SANCHEZ, DARWIN BATISTA, ABEL SEVERINO REYES, WARLY RUIZ, KELVIN LIRANZO ROMAN, MICHAEL MILIANO, YEFERSON VALLECILLO CAMBAR,⁹

⁹ YEFERSON VALLECILLO CAMBAR, A/K/A “ILLUMINATI” (“VALLECILLO”) is charged separately with Conspiracy to Conduct Enterprise Affairs Through a Pattern of Racketeering Activity, in violation of 18 U.S.C. § 1962(d). *See United States v. Yeferson Cambar Vallecillo*, Docket No. 24-CR-10335-NMG. As part of that Indictment, VALLECILLO is alleged to have participated in the September 2, 2023, murders of Jandriel Heredia and Abraham Diaz. On or about May 2024, VALLECILLO is believed to have fled the United States and returned to his native Honduras. On or about December 22, 2024, VALLECILLO was arrested in Honduras on a

JAMES JIMENEZ and CARLOS CORNIELLE RAMIREZ, are charged with participating in the murders of Jandriel Heredia and Abraham Diaz.¹⁰

k. The December 27, 2023, Murders of Kyle Mel and Isaiah Acevedo. As part of this federal investigation, ENMANUEL PAULA-CABRAL, ANGEL SANTOS, and DAVID GARCIA, are charged with participating in the murders of Kyle Mel and Isaiah Acevedo.

36. As part of the federal investigation, members of the Trinitarios criminal enterprise have been federally charged with six murders. Specifically, two of the murders took place in Lawrence, Massachusetts in 2017 (Espinal and Tran), and four of the murders took place in 2023, in the City of Lynn, Massachusetts (Diaz, Heredia, Mel and Acevedo). These murders have been alleged as special sentencing factors in the Indictments.

37. The Lynn murders taking place in 2023 are both double murders. The first double murder took place on September 2, 2023, on Essex Street in Lynn, Massachusetts, where Jandriel Hernandez and Abraham Diaz were killed during a drive-by shooting. The second double murder took place on December 27, 2023, on Camden Street in Lynn, Massachusetts, where Kyle Mel and Isaiah Acevedo were killed during a drive-by shooting. These murders were committed by Trinitarios members in retaliation for violence committed by rival gangs against the Trinitarios.

F. USE OF MUSIC VIDEOS AND SOCIAL MEDIA

38. Like many violent street gangs, the Trinitarios endeavor to project power over the internet and social media through the creation, marketing and promotion of music and music videos featuring their members. The music videos depict members of the gang holding and

provisional arrest warrant issued by Honduras authorities to facilitate his extradition to the United States in order to answer to this Indictment.

¹⁰ LEONARDO ESPINOZA, a juvenile “menore” of the Lynn Chapter of the Trinitarios is charged as an adult in Essex Superior Court with the murder of Jandriel Heredia and Abraham Diaz. *See Commonwealth v. Leonardo Espinoza*, Essex Superior Court, Docket No. 2477CR00392.

carrying firearms, and the lyrics contain boasts about their proclivity for violence, the scope of their successful drug distribution operations, and other money-making criminal endeavors. In the music videos, though, the Trinitarios pageantry, imagery and symbolism can be seen in full effect. The Trinitarios depicted in the videos wear Trinitarios colors and clothing. The paraphernalia and symbols associated with the Trinitarios organization are visible, and members throw up gang signs, along with weapons, cash and other items designed to evoke a simultaneous sense of dangerousness and prosperity.

39. In particular, these music videos have been identified in the investigation for their use by the Trinitarios as warnings and threats to other rival gangs. Additionally, the music videos contain entire groups of Trinitarios members associating and affiliating with each other while wearing and engaging in the symbolism of the Trinitarios. As such, the music videos serve to reflect the current standing and affiliation of the persons depicted within the Trinitarios organization. This is especially true because those who are not members would not be present for such gatherings or be permitted by other members to wear the regalia and symbols of the gang in the presence of other members. Furthermore, the lyrics reveal the current rivalries that the Trinitarios are engaged in with other gangs. Overall, given the numerous incidents of violence and drug distribution that have been recorded on video during the investigation, the music videos are best understood to be boastful admissions to the very racketeering activity for which the Trinitarios are under investigation.

40. LUIS ENRIQUE SANTANA, A/K/A “CHIQUITO”, A/K/A “YOUNG LS” (“ENRIQUE SANTANA”) is a member of the Lynn Chapter of the Trinitarios. ENRIQUE SANTANA is also a Trinitario rapper known as “Young LS.” Under that rap name, ENRIQUE

SANTANA has posted multiple music videos to YouTube that depict the Trinitarios organization and are emblematic of the Trinitarios' symbols, colors, and pageantry.

41. One such video entitled “Sacale Too” was filmed during a universal meeting on February 27, 2021, at an AirBNB rented by the Trinitarios in New Hampshire. According to information from multiple cooperating witnesses and informants, numerous new members of the gang were blessed-in during the ceremony by PAULA-CABRAL.

42. The video was uploaded onto YouTube on or around April 6, 2021, and can be viewed at <https://www.youtube.com/watch?v=q1m3m-jlekc>. In the video, members of the Trinitarios can be seen wearing black shirts with the Trinitario emblem (lime-green logo with crossed machetes) and their street-name above it, others are wearing or displaying green bandanas or ceremonial beaded necklaces associated with membership and leadership. The video contains written and visual references to the Trinitario enterprise including incorporating the numbers “1838”, the year the secret society within the Dominican Republic was founded and “41612”, which stands for “DPL” or “Dios, Patria Y Libertad” in the introduction of the video. Both numerical sequences hold significance to the Trinitario Enterprise as outlined in the Trinitario Magna Carta. In addition, the lyrics make reference to the commission of acts of violence, including shootings. While there are no firearms openly observed in the video, identified members are seen making hand gestures of firearms. Towards the end of the video, the street names of many notable members are stated over the music track.

43. Based on review of the video, and review of the video by multiple cooperating witnesses, the following Trinitario members can be seen in the video: LUIS ENRIQUE SANTANA A/K/A “CHIQUITO”, LUIS JEFFREY SANTANA A/K/A “SOPITA”, ANGEL SANTOS A/K/A “BIGGIE”, AARON DIAZ LIRANZO A/K/A “SOSA”, ERY JORDANI

ROSARIO, A/K/A “JORDANI”, A/K/A “RACACHA”, KELVIN LIRANZO ROMAN A/K/A “WHOOPTY”, WESTYN LANTIGUA A/K/A “WES”, A/K/A ”MUDDY”, JUSTIN ALBA A/K/A “TUTO”.

44. An example image of ANGEL SANTOS (to the left) wearing the custom black t-shirt bearing the green Trinitario logo, and his name “Biggie157” below.



Youngl\$ x @yeeleysy - "SACALE TOO" 🎵 Drill | Video Oficial DOMINICAN DRILL" ❤️



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45. Other music videos posted by ENRIQUE SANTANA depict Trinitario members holding and handling firearms. One such video is entitled, “REBU” which is a reference to the term “3BU” that means “Trinitario.” The “REBU” video was uploaded onto YouTube on or around February 8, 2022, and can be viewed at <https://www.youtube.com/watch?v=lcawwRSNkBw>. Multiple still images from that video follows, depicting Trinitarios holding firearms, including SANTOS (outlined in blue), and ENRIQUE SANTANA (outlined in green); other Trinitarios can also be seen holding firearms and pointing them at the camera:





III. STATE LEADERSHIP

46. The state leadership of the Trinitarios for Massachusetts consists of: ENMANUEL PAULA-CABRAL, A/K/A “MANNY”, A/K/A “GORDO”, A/K/A “NELFEW”, A/K/A “FEW”, the State Supreme of the Trinitarios in Massachusetts; ERY JORDANI ROSARIO, A/K/A “JORDANI”, A/K/A “RACACHA” the “Flag” or “Segundo” or Second-In-Command; and ANGEL SANTOS, A/K/A “BIGGIE”, A/K/A “BIG BOY” is the “Seguridad” or Security Officer. Additionally, LUIS JEFFREY SANTANA, A/K/A “SOPITA” is the Primera, or Number One of the Manchester Chapter of the Trinitarios.

A. ENMANUEL PAULA-CABRAL, A/K/A “MANNY”, A/K/A “GORDO”, A/K/A “NELFEW”, A/K/A “FEW”

47. ENMANUEL PAULA-CABRAL, A/K/A “MANNY”, A/K/A “GORDO”, A/K/A “NELFEW”, A/K/A “FEW” (“PAULA-CABRAL”) is the State Supreme of the Trinitarios in Massachusetts. In this position, PAULA-CABRAL commands dozens of Trinitarios across multiple chapters throughout the State of Massachusetts. I am also aware that the burgeoning Chapter of Manchester, New Hampshire also answers to PAULA-CABRAL. Investigators believe that PAULA-CABRAL assumed the position of State Supreme in roughly 2019 or 2020, when a power vacuum formed following the arrest and incarceration of the former State Supreme.

48. A photograph of PAULA-CABRAL follows:



49. PAULA-CABRAL was born in the Dominican Republic and is a naturalized citizen of the United States.

50. PAULA-CABRAL has a criminal record consisting of one continuation without a finding, but no convictions.

- a. On May 19, 2014, PAULA-CABRAL was charged in East Boston District Court in Docket 1405CR00687 with Distribution of a Class B Substance and Possession of a Class B Substance. On August 19, 2015, PAULA-CABRAL admitted to sufficient facts to Possession of a Class B substance and the case was continued without a finding, and ultimately dismissed.

51. From review of social media, cellular devices, and multiple cooperating witnesses, investigators know that PAULA-CABRAL is careful to insulate himself from the criminal activities of the Trinitarios. I am aware from recent activity that PAULA-CABRAL has instituted a policy of Trinitario Chapter Leaders employing “Flags”, as an additional layer of personnel in order to relay messages from the leaders to the membership so that the leaders are not seen or identified as issuing commands and approving violence directly. The “Flag” speaks and issues orders on the authority of the Leader, but allows the Leader to not be required to attend meetings or make statements directly. Additionally, I know that the Trinitarios are attempting to institute rules that return the organization to its “secret society” origins, such as the identities of the leaders and other members being shared on a need-to-know basis and not being freely spread among the members.

52. Two photographs of PAULA-CABRAL follow where PAULA-CABRAL can be observed wearing Trinitario beads. The first image depicts PAULA-CABRAL wearing what appears to a Trinitario beaded necklace around his neck at a Trinitario gathering and is taken from a video believed to been filmed at the universal meeting in February 2021. The second photograph depicts PAULA-CABRAL wearing Trinitario beads around his wrist. This second image is taken from a video depicting a Trinitario gathering at what appears to be a concert with numerous other Trinitario members who are in attendance at this concert.



53. PAULA-CABRAL is known to have directly authorized retaliatory violence by the Trinitarios against rival gangs in Lynn that resulted in at least four murders and multiple other shootings. PAULA-CABRAL's authorization or "green light" resulted in the Trinitarios gang members committing: a shooting on August 27, 2023; the drive-by shooting on September 2, 2023, that resulted in two deaths and five surviving victims who were struck by gunfire; and the drive-by shooting on December 27, 2023, that resulted in two deaths. PAULA-CABRAL is also believed

to have personally participated in at least two shootings: one taking place on March 16, 2019, and the other on August 5, 2021.

B. ERY JORDANI ROSARIO, A/K/A “JORDANI”, A/K/A “RACACHA”

54. ERY JORDANI ROSARIO, A/K/A “JORDANI”, A/K/A “RACACHA” (“JORDANI”) is a member of the Trinitarios. JORDANI has served in multiple roles in the organization. JORDANI was the Segundo, or Second of the Lynn Chapter. Recently, it is believed that JORDANI was promoted to the position of Segundo or “Flag” for the State Supreme of the Trinitarios in Massachusetts. In this position, JORDANI is the second-in-command and acts at the direction of PAULA-CABRAL in the leadership of the Massachusetts Trinitarios.

55. A photograph of JORDANI follows:



56. JORDANI was born in the Dominican Republic and is a naturalized citizen of the United States.

57. JORDANI has a criminal record consisting of one arrest, but no convictions.

58. Three photographs of JORDANI follow. The first is a photograph of JORDANI wearing Trinitario beads around his neck. The second is a photograph of JORDANI believed to have been taken during the February 27, 2021, universal meeting. In the photograph, JORDANI is observed wearing a Trinitarios t-shirt with his street name (“Racacha”) on it, and a custom lime

green Trinitario robe. The third photograph depicts JORDANI making the Trinitario gang sign, wearing a custom lime green Trinitario robe, and Trinitario beads.



C. ANGEL SANTOS, A/K/A “BIGGIE”, A/K/A “BIG BOY”

59. ANGEL SANTOS, A/K/A “BIGGIE”, A/K/A “BIG BOY” (“SANTOS”) is a Trinitario member who has held multiple positions in the organization. Previously, SANTOS served as the Securidad or Security Officer of the Lynn Chapter. In this position, SANTOS acts at the direction of PAULA-CABRAL in ensuring the security of meetings and undertaking violence on behalf of the Trinitarios. Later, SANTOS is believed to have been promoted to a state-wide position as “Flag” for the Supreme and functioned under PAULA-CABRAL as the second-in-command for the State of Massachusetts. SANTOS is believed to have held this state-wide position until he fled the United States in June 2024, when he was replaced by JORDANI.

60. A photograph of SANTOS follows:



61. SANTOS was born in the Dominican Republic and is a citizen of the United States.

62. SANTOS has a criminal record consisting of two arrests, but no convictions.

SANTOS is in default warrant status on multiple state court matters and is believed to have fled the United States approximately six months after his commission of a double murder that took place on December 27, 2023.

63. Investigators received information from multiple sources that SANTOS has fled the United States and is currently residing in the Dominican Republic. Upon consulting law enforcement databases, no record of SANTOS departing the United States on an international flight was discovered. However, further investigation revealed records indicating that on June 19, 2024, SANTOS departed from Mexico City on a flight destined for Bogota, Colombia. Furthermore, a phone number ending in 3523 was determined to have booked that flight. Further review of travel records revealed that SANTOS departed from Bogota, Colombia to Santo Domingo, Dominican Republic. A phone number ending in 6431 was used to book that flight.

64. The phone number ending in 3523 is known to investigators as being linked to JANOVY BATISTA, who is SANTOS' stepfather. Further consultation with law enforcement databases revealed that BATISTA traveled from Mexico City to Houston, Texas on June 19, 2024, utilizing the same phone number ending in 3523 to book the travel. It should be noted that there was no record of BATISTA or SANTOS departing the United States by plane, or any other

international flight that would deliver them from another country to Mexico City. This review of records is consistent with JANOVY BATISTA and SANTOS crossing over into Mexico at the southern border of the United States by foot or vehicle.

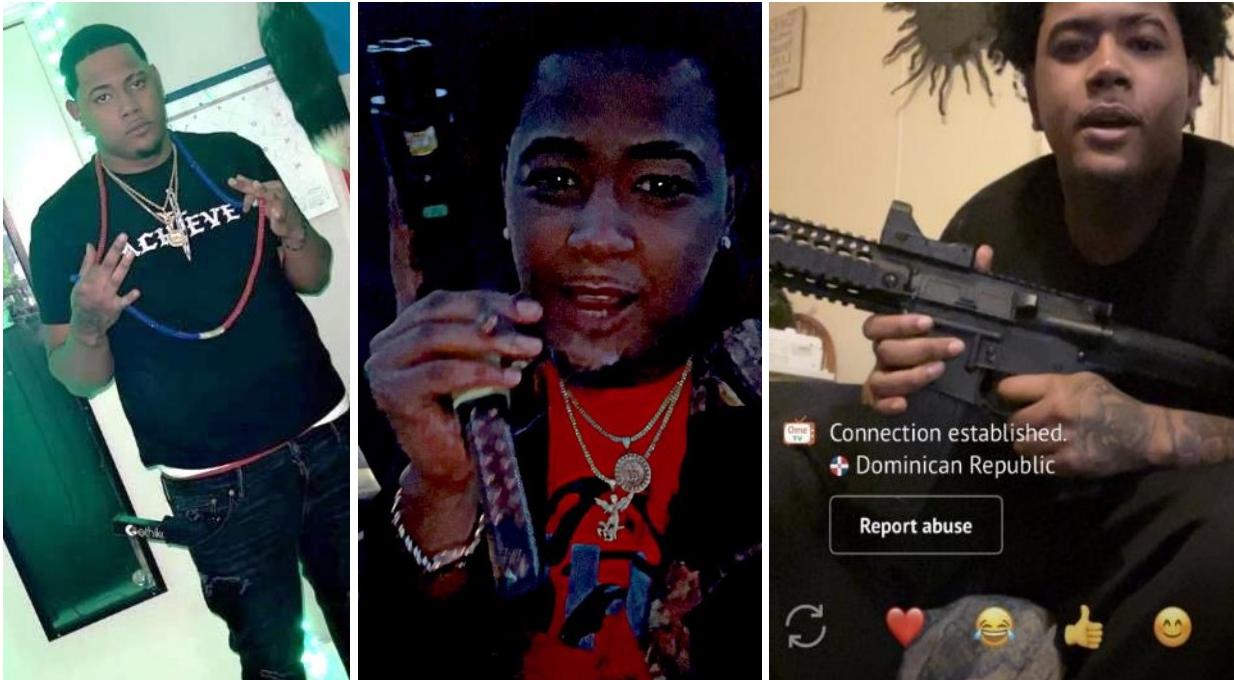
65. Photographs of SANTOS wearing Trinitario beads and making Trinitario gang signs follow:



66. Photographs of SANTOS taken during the February 27, 2021, universal gathering that served as the setting of the SACALE TOO music video follow. In the photographs, SANTOS is wearing the Trinitarios t-shirt with his street name on it ("Biggie157"), and Trinitario beads.



67. Photographs of SANTOS holding and carrying firearms follow. The first photograph depicts SANTOS wearing Trinitario beads, making Trinitario gang signs, and a firearm and extended magazine can be seen protruding from his pants pocket. The second photograph is a still image from a video depicting SANTOS holding a firearm and pointing it at the camera, with bullets visible in the clear magazine. The third photograph depicts SANTOS holding an AR-15 style rifle, with an extended box magazine inserted, holographic sight attachment, and vented handguard with rail system.



D. LUIS JEFFREY SANTANA, A/K/A “SOPITA”

68. LUIS JEFFREY SANTANA, A/K/A “SOPITA” (“JEFFREY SANTANA”) is the Primera or Number One of the Manchester New Hampshire Chapter of the Trinitarios. In this position, JEFFREY SANTANA is in overall command of the Chapter and is responsible for directing the members, consulting on gang activity, giving approvals, and recruiting new members.

69. A photograph of JEFFREY SANTANA follows:



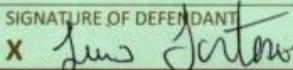
70. JEFFREY SANTANA was born in the Dominican Republic and is a legal permanent resident of the United States. JEFFREY SANTANA is not a citizen of the United States.

71. JEFFREY SANTANA has a criminal record consisting of one prior arrest in Woburn District Court, Docket No. 1953CR0463, for which he was charged with Distributing a Class A Substance.

- a. On December 9, 2019, JEFFREY SANTANA originally admitted to sufficient facts to this matter, after being advised of his alien warnings under Mass. Gen. Laws, c. 278, § 29D. The case was continued without a finding of guilty and JEFFREY SANTANA was placed on probation. A still image from the signed form during the admission to sufficient follows with the alien deportation warning and JEFFREY SANTANA's signature follows:

I understand that if I am not a citizen of the United States, the acceptance by this court of my plea of guilty, plea of nolo contendere, or admission to sufficient facts may have consequences of deportation, exclusion from admission to the United States, or denial of naturalization, pursuant to the laws of the United States. If the offense to which I am pleading guilty, nolo contendere, or admitting to sufficient facts is under federal law one that presumptively mandates removal from the United States and federal officials decide to seek removal, it is practically inevitable that this disposition would result in deportation, exclusion from admission, or denial of naturalization under the laws of the United States.

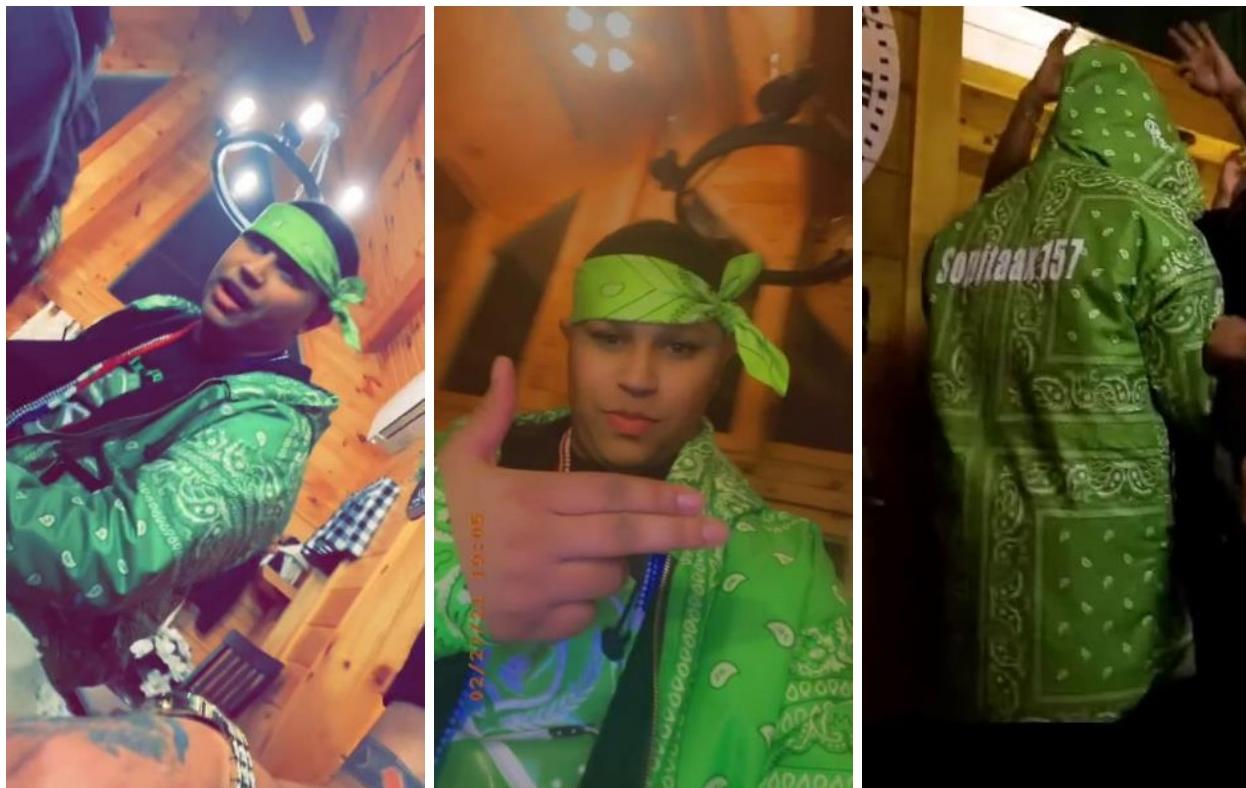
If any charge is being placed on file: I freely and voluntarily consent to the filing of that charge on the conditions listed on the front of this form. I understand that I have a right at any time to have the court remove it from the file and impose sentence (or schedule it for trial if no guilty finding has been made). I understand that the prosecutor may request the court to remove it from the file and impose sentence (or schedule it for trial if no guilty finding has been made) if a related conviction or sentence is reversed or vacated, or if the prosecutor proves by a preponderance of evidence either that I committed a new criminal offense or that any other condition listed on this front of this form has occurred. The prosecutor may do so at any time (or, if a time limit is listed on the front of this form, at any time until that date). I understand that, if the charge is removed from the file and I am sentenced, it may result in additional punishment in this case.

SIGNATURE OF DEFENDANT 	DATE 12/2/19	I have translated this document for the defendant. SIGNATURE OF INTERPRETER
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- b. JEFFREY SANTANA later filed a motion for new trial in this case on December 7, 2023. I have reviewed the court papers for this motion. The basis of that motion was that the admission to sufficient facts was the result of ineffective assistance of counsel, because JEFFREY SANTANA was not aware that the admission to sufficient facts would result in his deportation. This of course was the same immigration consequence specifically identified in the written form that he signed when he admitted to sufficient facts.
- c. On April 18, 2024, the motion was allowed in a margin entry by Judge Mehta, and the admission to sufficient facts was vacated. On June 18, 2024, JEFFREY SANTANA was then placed on pretrial probation for this case until June 17, 2025.

72. Photographs of JEFFREY SANTANA taken during the February 27, 2021, universal gathering that served as the setting of the SACALE TOO music video follow. In the photographs, JEFFREY SANTANA is wearing the Trinitarios t-shirt with his street name on it

(“Sopitaax157”), Trinitario beads, and a custom lime green Trinitario robe that bears his street name “Sopitaax157”.



IV. LAWRENCE CHAPTER

73. Multiple members of the Lawrence Chapter of the Trinitarios have been charged as part of Operation Paper Machetes. They are:

- a. ELVIS TRUJILLO, A/K/A “GORDO”, A/K/A “HONDURAS” (“TRUJILLO”);
- b. ERIC ROSARIO, A/K/A “MANIATICO”, A/K/A “MT” (“ROSARIO”);
- c. ROBERT SANTANA, A/K/A “PICCARINE” (“SANTANA”);
- d. ROSNEL POLANCO, A/K/A “JAI” (“POLANCO”); and
- e. ROBERT SEVERINO, A/K/A “PETETE” (“SEVERINO”).

74. ROSARIO, SANTANA, and POLANCO are members of the Lawrence Chapter of the Trinitario. ROSARIO, SANTANA, and POLANCO are charged federally with Conspiracy to Interfere with Commerce by Robbery (Hobbs Act Conspiracy), related to a December 2023, armed robbery of a jewelry store in Lawrence, during which approximately \$500,000 in diamonds, gold, and jewelry were stolen. *See United States v. Rosario, et. al.*, Docket No. 24-CR-10263-NMG. As noted in the charging materials, it is believed that SANTANA torched the getaway vehicle used in the robbery in Maine shortly after the incident. *See* 24-CR-10263-NMG, ECF #1-4.

75. SEVERINO is charged separately in Essex County Superior Court with Murder, in relation to the March 8, 2017, murder of Juan Espinal that SEVERINO committed with TRUJILLO. *See Commonwealth v. Robert Severino*, Essex Superior Court, Docket No. 2477CR00493.

A. ELVIS TRUJILLO, A/K/A “GORDO”, A/K/A “HONDURAS”

76. ELVIS TRUJILLO, A/K/A “GORDO”, A/K/A “HONDURAS” is a Lawrence Trinitario member. TRUJILLO was blessed into the gang at some point following the murder of Juan Espinal that TRUJILLO committed at the direction of and on behalf of the Lawrence Chapter leadership. I am aware of multiple cooperating witnesses identifying TRUJILLO as a Trinitario

member. I have also observed photographs of TRUJILLO with other members and leaders of the Trinitarios, and other photographs and videos where TRUJILLO makes Trinitario gang signs.

77. A photograph of TRUJILLO follows:



78. TRUJILLO was born in Honduras. TRUJILLO entered the United States without inspection and has never held immigration status in the United States. TRUJILLO was deported to Honduras following multiple criminal convictions in 2022.

79. TRUJILLO has a criminal record of multiple convictions.

a. On February 26, 2018, TRUJILLO was charged in Lawrence District Court in Docket 1818CR00883 with Assault by Means of Dangerous Weapon to wit: gun, Discharging a Firearm, Malicious Destruction of Property, and Possession of a Firearm without a Permit. On September 17, 2019, TRUJILLO pled guilty and was sentenced to two years in jail.

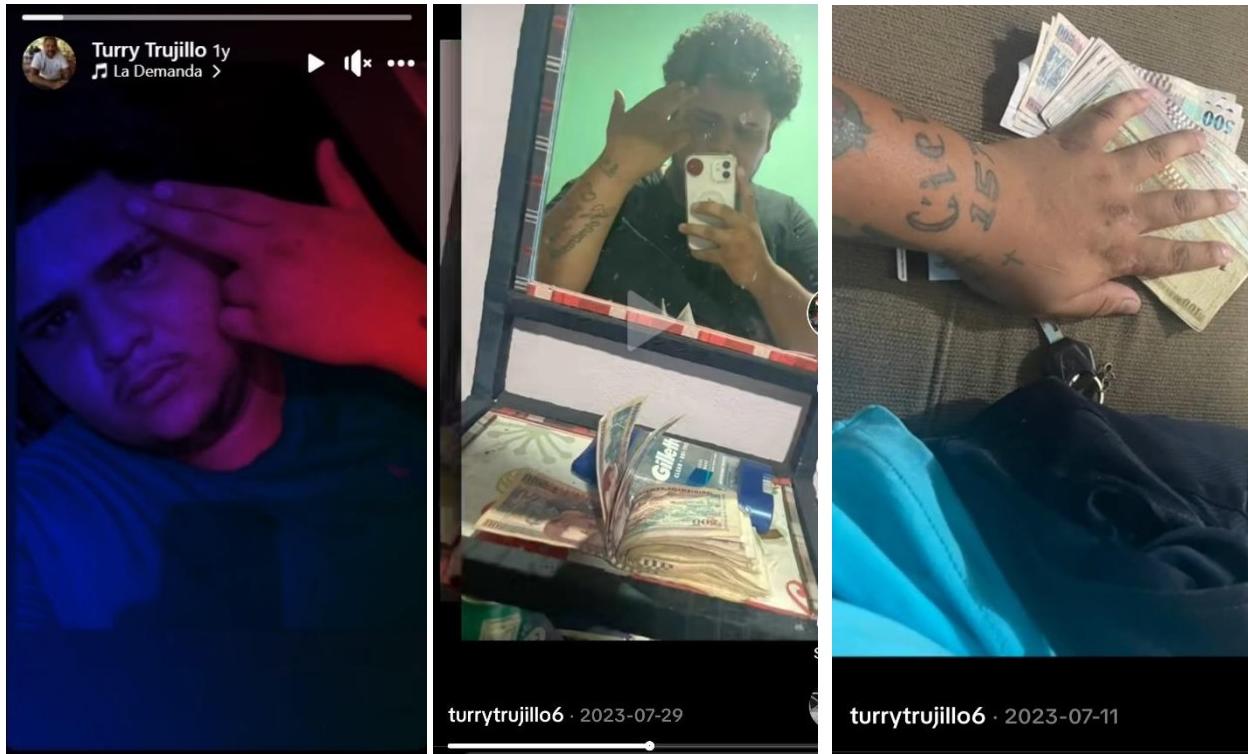
i. I am familiar with the facts of this conviction as described in Lawrence Police Report #18001245. On February 21, 2018, at 11:48 AM, Lawrence Police responded to a gas station for a report of two individuals shooting at one another. A nearby resident reported that one of the projectiles entered her residence and ricocheted off the walls, but no one was injured. Police obtained surveillance video that depicted TRUJILLO as one of the shooters. Eleven shots were also captured on the audio from the footage. In the video, TRUJILLO is wearing a construction jacket, an orange shirt and holding a firearm. A still image from that surveillance video follows:



- b. On January 23, 2019, TRUJILLO was charged in Salem District Court in Docket 1936CR00145, with Leaving the Scene of Property Damage. On March 6, 2019, TRUJILLO admitted sufficient facts, the case was continued without a finding and TRUJILLO was placed on a period of probation. TRUJILLO violated probation, was found guilty, and was sentenced to 45 days in jail.
- c. On May 8, 2019, TRUJILLO was charged in Lawrence District Court in Docket No. 1918CR01417, with Possession of a Class A Substance. This case was dismissed on September 17, 2019.
- d. On September 16, 2019, TRUJILLO was charged in Lawrence District Court with Docket No. 1918CR03819, with Possession of a Firearm During a Felony, Possession of a Firearm without a Permit, and Trafficking Fentanyl Over 10 Grams. This case was later indicted as Essex Superior Court, Docket No. 1977CR00516 and TRUJILLO was charged with Possession of a Firearm without a Permit, and Possession of a Class A Substance. On June 3, 2021, TRUJILLO pleaded guilty to the case and was sentenced to two and one-half years in state prison.

i. I am familiar with the facts of this conviction as described in MSP Report #2019-0A1-011785. On September 13, 2019, at 8:00 PM, MSP Troopers observed a vehicle drive by with a broken taillight. They pulled the vehicle over and observed that TRUJILLO was driving. SEVERINO was in the rear of the vehicle. Troopers observed an open Corona bottle and observed that TRUJILLO was wearing an ankle bracelet. TRUJILLO did not have identification and was identified based on his open case. During the interaction with the Troopers, TRUJILLO reached for the rear of the vehicle. The Troopers ordered TRUJILLO, SEVERINO and the other front seat passenger to exit the vehicle. In the area where TRUJILLO reached, Troopers located a Smith & Wesson .38 caliber firearm with 5 rounds of ammunition. TRUJILLO was placed under arrest and during a search incident to that arrest, a cylinder containing approximately 9.81 grams of fentanyl was recovered.

80. After his deportation and prior to his recent arrest in December 2024, TRUJILLO remained active on social media, including Facebook and TikTok. In public postings, TRUJILLO continued to affirm his allegiance and membership to the Trinitarios. Still images of TRUJILLO from social media follow. In the first and second image, TRUJILLO can be observed making Trinitario gang signs. In the third image, TRUJILLO's tattoo of "157", a cipher, as explained above, is significant to the Trinitarios, can be observed on his wrist.



81. Following his deportation, TRUJILLO was believed to be residing in Honduras. Postings by TRUJILLO depicted him in a rural setting consistent with Honduras. Review of IP Addresses and other digital evidence further confirmed that he was in Honduras. A still image from TRUJILLO's social media depicting TRUJILLO on a horse in Honduras follows:



82. On or about December 22, 2024, TRUJILLO was arrested by Honduran authorities on a warrant issued by the United States District Court for the District of Massachusetts, charging TRUJILLO with Racketeering Conspiracy, and specifically alleged TRUJILLO's participation in the murders of Juan Espinal and Mindy Tran as special sentencing factors.

V. LYNN CHAPTER

83. As part of Operation Paper Machetes, the following members and associates of the Lynn Chapter of the Trinitarios have been charged with Racketeering Conspiracy, in violation of 18 U.S.C. § 1962(d), or related offenses.

- AARON DIAZ LIRANZO, A/K/A “SOSA”, the Primera, or Number One of the Lynn Chapter of the Trinitarios;

- TOMY SANCHEZ, A/K/A “MANITO BELLO”, the Number Three of the Lynn Chapter of the Trinitarios;¹¹
- JUSTIN ALBA, A/K/A “TUTO”, A/K/A “MIMI”, the Disciplina of the Lynn Chapter of the Trinitarios;
- DARWIN BATISTA, A/K/A “EL PY”;
- YEFERSON VALLECILLO CAMBAR, A/K/A “ILLUMINATI”;¹²
- WARLY RUIZ;¹³
- ABEL SEVERINO REYES, A/K/A “RICO”;¹⁴
- DAVID GARCIA, A/K/A “BAMBINO”;¹⁵
- LEONARDO ESPINOZA, A/K/A “PININA”;¹⁶
- CARLOS CORNIELLE RAMIREZ, A/K/A “KREEPY”;¹⁷
- KELVIN LIRANZO ROMAN, A/K/A “WOOPTY”;
- MICHAEL MILIANO, A/K/A “TRUCHO”;
- JAMES JIMENEZ;

¹¹ Charged separately in *United States v. Tomy Sanchez*, Docket No. 25-CR-10007-NMG.

¹² Charged separately in *United States v. Yeferson Vallecillo Cambar*, Docket No. 24-CR-10335-NMG, with Racketeering Conspiracy, in violation of 18 U.S.C. § 1962(d). VALLECILLO’s participation in the September 2, 2023, murders of Jandriel Heredia and Abraham Diaz are alleged as special sentencing factors. VALLECILLO was separately indicted and arrested in Honduras on or about December 22, 2024, and is pending extradition to the United States.

¹³ Charged separately in *United States v. Warly Ruiz*, Docket No. 24-CR-10380-NMG.

¹⁴ Charged separately in *United States v. Abel Severino Reyes*, Docket No. 24-CR-10373-NMG.

¹⁵ Charged separately in *United States v. David Garcia*, Docket No. 25-CR-10006-NMG.

¹⁶ Charged separately in *Commonwealth v. Leonardo Espinoza*, Essex Superior Court, Docket No. 2477CR00392. ESPINOZA is a juvenile associate of the Trinitarios charged as an adult with two counts of murder related to the September 2, 2023, murders of Jandriel Heredia and Abraham Diaz.

¹⁷ Charged separately in *United States v. Carlos Javier Ramirez Cornielie*, Docket No. 25-CR-10008-NMG. RAMIREZ is a juvenile associate of the Trinitarios charged as an adult with one count of Racketeering, in violation of 18 U.S.C. 1962(c). The September 2, 2023, murders of Jandriel Heredia and Abraham Diaz are alleged as special sentencing factors in the Indictment.

- LUIS ENRIQUE SANTANA, A/K/A “CHIQUITO”, A/K/A “YOUNG LS”;
- WESTYN LANTIGUA, A/K/A “WES”, A/K/A “MUDDY”;
- WILVING LOPEZ, A/K/A “BOLU”;¹⁸
- ISRAEL GARCIA VASQUEZ, A/K/A “MENOL”, A/K/A “MENOR”;
- RICARDO BRATINI-PEREZ, A/K/A “RICO FROM THE SIN”;¹⁹
- JANOV BATISTA, A/K/A “EL VIEJO”.

A. AARON DIAZ LIRANZO, A/K/A “SOSA”

84. AARON DIAZ LIRANZO, A/K/A “SOSA” (“SANTOS”) is the Primera, or Number One of the Lynn Chapter of the Trinitarios. In this position, DIAZ LIRANZO is in overall command of the Chapter, and is responsible for directing the members, consulting on gang activity undertaken by the Chapter, giving approvals, and recruiting new members. DIAZ LIRANZO is believed to have been a member since at least 2021, due to his presence in music videos wearing a Trinitarios t-shirt, numerous photographs depicting him wearing Trinitario beads, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

85. A photograph of DIAZ LIRANZO follows:



¹⁸ Charged separately in *United States v. Wilving Lopez*, Docket No. 25-CR-10062-NMG.

¹⁹ Charged separately in *United States v. Ricardo Bratini-Perez*, Docket No. 24-cr-10310-LTS, with independent drug offenses related to purchases made by an undercover officer and the execution of a search warrant. BRATINI-PEREZ has pleaded guilty to federal drug charges and is awaiting sentencing.

86. DIAZ LIRANZO was born in the Dominican Republic and is a citizen of the United States.

87. DIAZ LIRANZO has a criminal record consisting of two arrests, but no convictions. DIAZ LIRANZO is currently on pretrial release for two cases:

- a. Essex Superior Court, Docket No. 2477CR00176, charging DIAZ LIRANZO with Money Laundering. This case is related to a series of burglary of convenience stores in which lottery tickets were stolen. The facts related to DIAZ LIRANZO's involvement are set forth below, as racketeering activity. DIAZ LIRANZO was released after posting \$10,000 cash bail.
- b. Chelsea District Court, Docket No. 2414CR001120, charging DIAZ LIRANZO with Possession with Intent to Distribute Class A Substance. This case is related to an April 24, 2024, search warrant that was executed at his residence for the convenience store burglary investigation. During the search, three bags of blue pills that were consistent with counterfeit Percocet pills were recovered. These pills were later tested at the Massachusetts State Police Crime Lab and determined to contain fentanyl and weigh approximately 20 grams. DIAZ LIRANZO was released on pretrial conditions on April 24, 2024, after posting \$1,500 cash bail.

88. Exemplary photographs of DIAZ LIRANZO wearing a Trinitario beaded necklace follow. The first photograph depicts DIAZ LIRANZO (left) and SANTOS (right) wearing Trinitario beaded necklaces and hats with the star symbol; they are also making gang signs with their hands. In the first photograph DIAZ LIRANZO can be seen wearing beads that prominently display green colors, which signifies his leadership position as "First" of the Lynn Chapter. The second photograph depicts DIAZ LIRANZO (left) and KELVIN LIRANZO ROMAN, A/K/A "WOOPTY" (right), both wearing Trinitario beaded necklaces, and ROMAN is making gang signs with his hands. The third photograph depicts TOMY SANCHEZ, A/K/A "MANITO BELLO" (left) and DIAZ LIRANZO (right) wearing Trinitario beaded necklaces, making Trinitario gang signs, and Trinitario related emojis of green hearts and pineapples.



89. DIAZ LIRANZO is also present in the “Sacale Too” music video, wearing a mask, a baseball hat, and a cross-body bag with the word “SUPREME” on it. DIAZ LIRANZO can be seen in the video dancing and throwing gang signs. A still image from the music video follows, with DIAZ LIRANZO outlined in blue interacting with SANTOS (wearing the “Biggie157” shirt and green bandanna), ENRIQUE SANTANA (wearing a red sweatshirt with the flag of the Dominican Republic, a beaded necklace and a green bandanna), and JEFFREY SANTANA (wearing the “Sopita157” shirt, bandanna, and beads):



90. A series of photographs depicting DIAZ LIRANZO holding firearms follow, including two photographs depicting him in possession of what appears to be a submachine-gun style weapon, with retractable stock and extended capacity magazine:





B. JUSTIN ALBA, A/K/A "TUTO", A/K/A "MIMI"

91. JUSTIN ALBA, A/K/A "TUTO", A/K/A "MIMI" ("ALBA") is the Disciplina or Discipline of the Lynn Chapter of the Trinitarios. In this position, ALBA is responsible for ensuring discipline among the ranks of the members administering punishments to members for violating the directives and rules of the gang, and ensuring adherence to the principles of the gang set forth in the Magna Carta. ALBA is believed to have been a member since at least 2021, due to his presence in music videos wearing a Trinitarios t-shirt, numerous photographs depicting him wearing Trinitario beads, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

92. A photograph of ALBA follows:



93. ALBA was born in the United States and is a United States Citizen.

94. I am familiar with ALBA's criminal record and know that he has been arrested on numerous occasions but has yet to be convicted of criminal offense. These arrests include possession with intent to distribute a class D substance, uttering a counterfeit note, operating a vehicle with a suspended license, and possession of a firearm without a license.

95. Multiple photographs follow depicting ALBA (outlined in red) wearing Trinitario beaded necklaces and the color green and making Trinitario gang signs.





C. DARWIN BATISTA, A/K/A “EL PY”

96. DARWIN BATISTA, A/K/A “EL PY” (“DARWIN BATISTA”) is a member of the Lynn Chapter of the Trinitarios. DARWIN BATISTA is believed to have been a member since at least 2023, due to numerous photographs depicting him wearing Trinitario beaded necklaces, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

97. A photograph of DARWIN BATISTA follows:



98. DARWIN BATISTA was born in the Dominican Republic. DARWIN BATISTA is a legal permanent resident of the United States, and not a citizen of the United States.

99. DARWIN BATISTA has no record of criminal convictions. DARWIN BATISTA has been charged in state court related to the convenience store burglaries and the September 2, 2023, double murder.

100. Photographs of DARWIN BATISTA follow that depict him wearing Trinitario beads. The first photograph depicts MILIANO (left) and DARWIN BATISTA (right) wearing Trinitario beads and making Trinitario gang signs.



D. YEFERSON VALLECILLO CAMBAR, A/K/A "ILLUMINATI"

101. YEFERSON VALLECILLO CAMBAR, A/K/A "ILLUMINATI" ("VALLECILLO") is a member of the Lynn Chapter of the Trinitarios. VALLECILLO is believed to have been a member since at least 2023, due to numerous photographs depicting him wearing

Trinitario beaded necklaces, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

102. A photograph of VALLECILLO follows:



103. VALLECILLO was born in Honduras. VALLECILLO entered the United States without inspection and held no immigration status while in the United States.

104. VALLECILLO has no record of prior convictions.

105. I am aware that VALLECILLO fled the United States at some point in 2024. In July 2024, a criminal complaint issued in Lynn District Court that charged him with participating in the September 2, 2023, murders of Jandriel Heredia and Abraham Diaz. VALLECILLO was not apprehended on this warrant while in the United States. Following his federal indictment, VALLECILLO was apprehended by Honduran authorities on or about December 22, 2024, pursuant to a provisional arrest warrant issued by the Honduras Court, pending extradition to face the above-referenced Indictment charging Racketeering Conspiracy.

106. Photographs of VALLECILLO wearing a Trinitario beaded necklace and making Trinitario gang signs follow.



E. KELVIN LIRANZO ROMAN, A/K/A “WOOPTY”

107. KELVIN LIRANZO ROMAN, A/K/A “WOOPTY” (“ROMAN”) is a member of the Lynn Chapter of the Trinitarios. ROMAN is believed to have been a member since at least 2021, due to his presence in music videos wearing a Trinitarios t-shirt, numerous photographs depicting him wearing Trinitario beads, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

108. A photograph of ROMAN from the Mass. RMV follows:



109. ROMAN was born in the Dominican Republic. ROMAN is a legal permanent resident of the United States, and not a citizen of the United States. ROMAN has no record of criminal convictions.

110. Photographs follow depicting ROMAN wearing Trinitario beaded necklaces, throwing Trinitario gang signs, and wearing Trinitario gang colors. The first photograph depicts ROMAN (left) and SANTOS (right) wearing custom Trinitarios t-shirts with their street-names on them. The second photograph depicts BRATINI-PEREZ (left) and ROMAN (center) making Trinitario gang signs, and wearing Trinitario beaded necklaces. The third photograph depicts DIAZ LIRANZO (left) and ROMAN (right) wearing Trinitario beaded necklaces, and ROMAN is flashing Trinitario gang signs. The fourth photograph depicts ROMAN holding a firearm.





F. MICHAEL MILIANO, A/K/A “TRUCHO”

111. MICHAEL MILIANO, A/K/A “TRUCHO” (“MILIANO”) is a member of the Lynn Chapter of the Trinitarios. MILIANO is believed to have been a member since at least 2023, due to numerous photographs depicting him wearing a Trinitario beaded necklace, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

112. A photograph of MILIANO follows:



113. MILIANO was born in the Dominican Republic. MILIANO and is a legal permanent resident of the United States, and not a citizen of the United States.

114. I am familiar with MILIANO's criminal history.

- a. On or about October 5, 2023, MILIANO was charged in Salem District Court, Docket No. 2336CR01764, with possession of a class D substance, and possession of a class C substance. On March 27, 2024, MILIANO admitted to sufficient facts and the case was continued without a finding. MILIANO is on probation for this matter.

115. Photographs of MILIANO follow depicting MILIANO wearing a Trinitario beaded necklace and throwing Trinitario gang signs follow.



G. JAMES JIMENEZ

116. JAMES JIMENEZ ("JIMENEZ") is a member of the Lynn Chapter of the Trinitarios, and particularly was part of the sub-faction based in Salem. JIMENEZ is believed to

have been a member since at least 2023, due to photographs of him throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

117. A photograph of JIMENEZ follows:



118. JIMENEZ was born in the United States and is a citizen of the United States.

119. JIMENEZ has no criminal history of convictions. JIMENEZ is known to have a license to carry firearms.

120. A photograph of JIMENEZ follows with JIMENEZ throwing a Trinitario gang sign follows:



H. LUIS ENRIQUE SANTANA, A/K/A “CHIQUITO”, A/K/A “YOUNG LS”

121. LUIS ENRIQUE SANTANA, A/K/A “CHIQUITO”, A/K/A “YOUNG LS” (“ENRIQUE SANTANA”) is a member of the Lynn Chapter of the Trinitarios. ENRIQUE SANTANA is believed to have been a member since at least 2021, due to his presence in music videos wearing a Trinitarios t-shirt, numerous photographs depicting him wearing Trinitario beaded necklaces, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

122. A photograph of ENRIQUE SANTANA follows:



123. LUIS ENRIQUE SANTANA was born in the Dominican Republic. LUIS ENRIQUE is a legal permanent resident of the United States, and not a citizen of the United States.

124. I am familiar with ENRIQUE SANTANA’s criminal record and know that he has been arrested on multiple prior occasions but has yet to be convicted of a criminal offense.

- a. On June 5, 2018, ENRIQUE SANTANA was charged in Lynn District Court with resisting arrest and attempted larceny under \$1,200. On July 16, 2019, ENRIQUE SANTANA admitted to sufficient facts and the case was continued without a finding. ENRIQUE SANTANA violated probation and the case was dismissed.

125. Photographs follow depicting ENRIQUE SANTANA wearing Trinitario beaded necklaces, a custom Trinitario t-shirt with his street-name on it and wearing Trinitario colors. The first photograph depicts ENRIQUE SANTANA wearing a Trinitario beaded necklace. The second

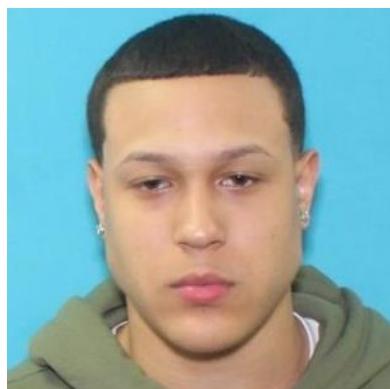
photograph depicts DIAZ LIRANZO (left) and ENRIQUE SANTANA (right) who is wearing a custom Trinitario t-shirt with his name on it, and he is holding a green bandanna. The third photograph depicts ENRIQUE SANTANA wearing a Trinitario beaded necklace. The fourth photograph is a still image from the SACALE TOO music video depicting LOPEZ (left), ENRIQUE SANTANA (center), and DIAZ LIRANZO (right).



I. WESTYN LANTIGUA, A/K/A “WES”, A/K/A “MUDDY”

126. WESTYN LANTIGUA, A/K/A “WES”, A/K/A “MUDDY” (“LANTIGUA”) is formally a member of the Boston Chapter of the Trinitarios, but is believed to be a member of the Lynn Chapter. LANTIGUA is believed to have been a member since at least 2022, due to numerous photographs depicting him wearing Trinitario beaded necklaces, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

127. A photograph of LANTIGUA follows:



128. LANTIGUA was born in the United States and is a United States Citizen.

129. I am familiar with LANTIGUA’s criminal record. I know that he is currently charged with numerous pending criminal offenses, but has yet to be convicted as an adult.

130. Photographs of LANTIGUA wearing Trinitario beaded necklaces follow. In the first photograph, LANTIGUA can be observed in front of the flag of the Dominican Republic, throwing the Trinitario gang signs with his hands, while wearing a Trinitario beaded necklace. In the second photograph, LANTIGUA can be observed wearing a Trinitario beaded necklace and making gang signs with his left hand.



131. LANTIGUA can also be observed holding firearms in the following photographs that were recovered during the course of the investigation. In the first photograph, LANTIGUA can be observed at the left making a Trinitario gang sign and holding a firearm with a green laser that he is pointing at the camera, with DIAZ LIRANZO to the right. In the second photograph LANTIGUA can be observed holding a firearm with a drum magazine, and a visible serial number plate beneath the barrel.



J. ISRAEL GARCIA VASQUEZ, A/K/A “MENOL”, A/K/A “MENOR”

132. ISRAEL GARCIA VASQUEZ, A/K/A “MENOL”, A/K/A “MENOR” (“GARCIA VASQUEZ”) is a member of the Lynn Chapter of the Trinitarios. GARCIA VASQUEZ is believed to have been a member since at least 2022, due to numerous photographs depicting him wearing Trinitario beaded necklaces, throwing Trinitarios gang signs, and multiple cooperating witnesses identifying him as a member.

133. A photograph of GARCIA VASQUEZ follows:



134. GARCIA VASQUEZ was born in the Dominican Republic. GARCIA VASQUEZ is a legal permanent resident of the United States, and not a citizen of the United States.

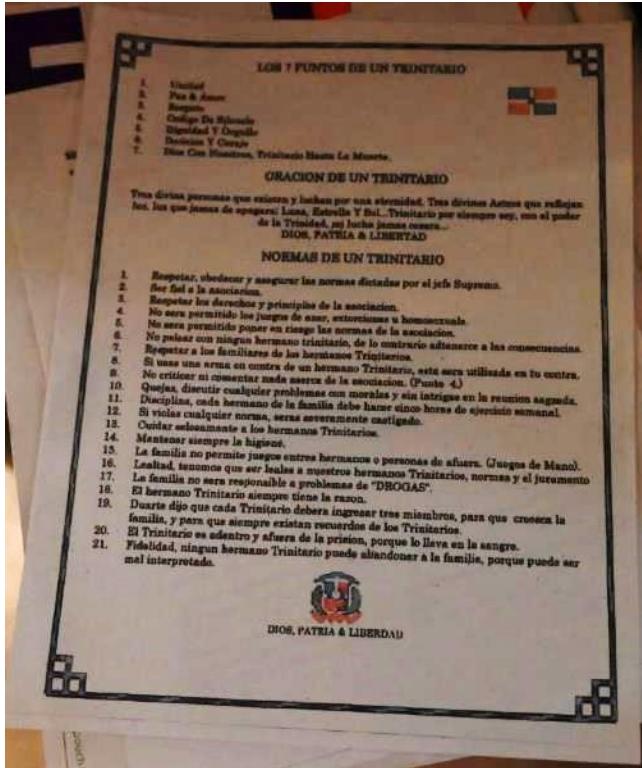
135. GARCIA VASQUEZ has a criminal record consisting of a prior drug conviction. GARCIA VASQUEZ is also currently charged with:

- a. Essex Superior Court, Docket No. 2177CR00284, charging GARCIA VASQUEZ with Possession with Intent to Distribute Class A substance, and Possession of Class B substance. GARCIA VASQUEZ pleaded guilty to these charges on November 15, 2022, and was placed on two years of probation. GARCIA VASQUEZ was found to have violated probation based on his arrest for the convenience store burglaries, and on August 7, 2024, was sentenced to 1 year of incarceration.
- b. Essex Superior Court, Docket No. 2477CR001139, charging GARCIA VASQUEZ with Money Laundering. This case is related to a series of burglary of convenience stores in which lottery tickets were stolen. The facts related to GARCIA VASQUEZ's involvement are set forth below, as racketeering activity. This case remains pending.

136. Photographs follow depicting GARCIA VASQUEZ wearing Trinitario beaded necklaces and the color green and making Trinitario gang signs. The first photograph depicts GARCIA VASQUEZ (left) and SANTOS (right) wearing Trinitario beads. The second photograph depicts GARCIA VASQUEZ (left) ALBA (center) and SANTOS (right) wearing Trinitario beads.



137. During a search of GARCIA VASQUEZ's residence on April 24, 2024, as part of an MSP investigation of a series of convenience store burglaries, investigators located a large amount of Trinitario beads, green bandanas, and a copy of the Trinitario Magna Carta. That day, GARCIA VASQUEZ and a number of other Trinitarios were arrested on state charges related to the burglaries. Still images from the search follow. The first photograph depicts the Magna Carta of the Trinitarios, listing the Seven Points or Puntos of the gang, the Trinitario Prayer, and the Rules of the Trinitarios. The second and third photographs depict the large number of Trinitario beaded necklaces that were found in GARCIA VASQUEZ's residence.



138. The seizure of the beaded necklaces from GARCIA VASQUEZ's residence on April 24, 2024, was significant. PAULA-CABRAL in fact discussed the seizure with another prominent Trinitario who I will refer to as CC-12 two days after MSP conducted a series of arrests and search warrants related to the convenience store burglaries. In the conversation, CC-12 states that he is mad because the newspaper articles are mentioning the Trinitarios in relation to the arrests ("What pisses me off is they mentioned the Trinitarios."). PAULA-CABRAL replies that they are doing so because of the beads that they found on "El Menor", referring to GARCIA VASQUEZ. PAULA-CABRAL then reiterates that all of the necklaces were located there. PAULA-CABRAL then sends two emojis of a figure slapping his forehead in disappointment. The preliminary translation of that conversation follows:

AUTHOR	CONTENT PRELIMINARY TRANSLATED	DATE - TIME
CC-12	What pisses me off is they mentioned the Trinitarios.	4/26/2024 4:48:57 PM(UTC-4)
PAULA-CABRAL	Brother it is because of the beads that they found on El Menor.	4/26/2024 5:27:31 PM(UTC-4)
CC-12	Ohhhhhh	4/26/2024 5:42:09 PM(UTC-4)
CC-12	Ahora fue k	4/26/2024 5:42:13 PM(UTC-4)
PAULA-CABRAL	Brother all of the jewelry from the capital, all.	4/26/2024 5:51:17 PM(UTC-4)
PAULA-CABRAL	👤	4/26/2024 5:51:24 PM(UTC-4)

K. JANOY BATISTA, A/K/A "EL VIEJO"

139. JANOY BATISTA, A/K/A "EL VIEJO" ("JANOY BATISTA") is an associate of the Lynn Chapter of the Trinitarios but is not a formal member of the Trinitarios. JANOY BATISTA is believed to have been associated with the Trinitarios since at least 2021. Based on information from multiple cooperating witnesses, text messages, and other evidence gathered in the investigation, JANOY BATISTA is believed to be a large-scale drug supplier to the Trinitarios and a close associate of PAULA-CABRAL. JANOY BATISTA is also the step-father of ANGEL SANTOS and the father of DARWIN BATISTA.

140. A photograph of JANOEY BATISTA follows:



141. JANOEY BATISTA was born in the Dominican Republic and is a citizen of the United States. JANOEY BATISTA has a criminal record consisting of four arrests for drug offenses and assault offenses, but no convictions.

VI. ATTEMPTED MURDERS AND CONSPIRACIES TO MURDER RIVAL GANG MEMBERS

A. 3/8/2017, MURDER OF JUAN ESPINAL

142. I am familiar with the facts concerning the murder of Juan Espinal in Lawrence on March 8, 2017. According to multiple cooperating witnesses, Espinal was murdered by ROBERT SEVERINO, A/K/A “PETE”, and ELVIS TRUJILLO, A/K/A “GORDO”, A/K/A “HONDURAS.” Espinal was “green lit” by the Lawrence Chapter of the Trinitarios and SEVERINO and TRUJILLO were ordered to kill Espinal by a lesser leader of the Trinitarios.

i. Initial Police Response and Crime Scene

143. According to Lawrence Police Report #17001851, and reports related to MSP Case #2017-106-129, on March 8, 2017, at 12:58 AM, Lawrence Police received a series of calls reporting shots fired. In sum, the reports detailed multiple gunshots, a man reportedly shot at the corner of Crescent and Forest Streets, and suspects running towards the cemetery.

144. Officers responded and found the victim, identified as Juan Espinal (DOB: xx-xx-98), had been pronounced dead at scene. Espinal was a Hispanic male, found face up partially on

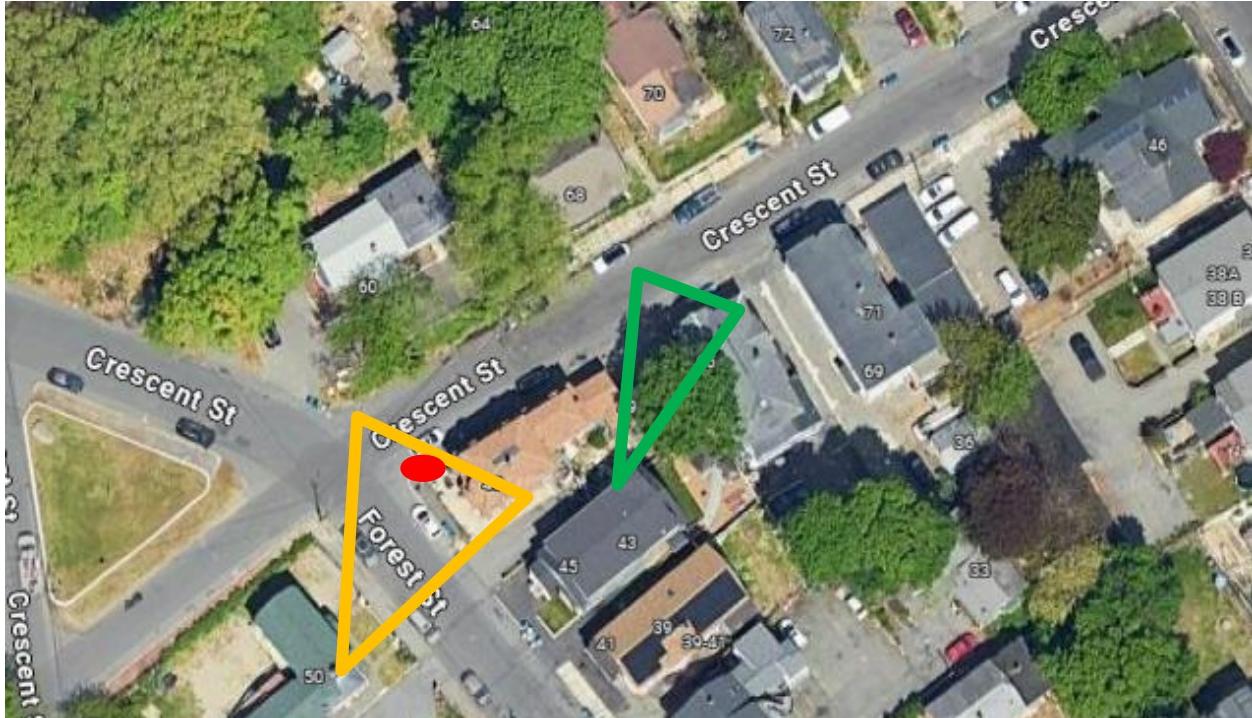
the sidewalk near the southeast corner of Forest and Crescent Streets. Officers observed numerous expended cartridge casings on the street nearby on Forest Street. Espinal also had what appeared to be a gunshot wound near his left eye. Espinal also was not wearing sneakers at the time his body was recovered – one sneaker was found nearby. An autopsy subsequently revealed that Espinal had sustained gunshot wounds to the hip, buttocks, and head.

145. Multiple shell casings were recovered near the intersection of Forest Street and Crescent Street. Additional casings were recovered in front of 57 Crescent Street and in the driveway. These casings were later determined to be in .380 caliber and .40 caliber. Crime scene photos follow depicting the location of some of the recovered casings.





146. Video surveillance images retrieved from nearby security cameras attached to the dwellings located at 45 and 50 Forest Street captured the murder on video. A map of the area follows with the 45 Forest camera perspective set forth in a green triangle, and the 50 Forest Street camera perspective set forth in an orange triangle. The location of Espinal's body was at the corner of in identified as a red circle.



ii. 45 Forest Street Surveillance Footage

147. On the 45 Forest Street camera two individuals enter the driveway at 57 Crescent Street at least an hour prior to the fatal shooting. The two suspects, one heavier set (identified to ELVIS TRUJILLO)²⁰ and one smaller (identified to be ROBERT SEVERINO),²¹ remain in the driveway, at times crouching behind the building, or standing behind one of five vehicles parked in the driveway.

148. The suspects appear to be actively concealing their presence at the location, as they move and conceal themselves each time a vehicle approaches the driveway, and then reappear after the vehicle has passed by the driveway. A still image showing TRUJILLO (outlined in green)

²⁰ At the time of the murder, ELVIS TRUJILLO is known to have been 19 years old, be approximately 5 foot 8 inches tall, and weigh approximately 250 to 280 pounds.

²¹ At the time of the murder, ROBERT SEVERINO is known to have been 17 years old, be approximately 5 foot 5 inches tall, and weigh approximately 120 to 140 pounds.

and SEVERINO (outlined in blue) waiting in the driveway of 57 Crescent Street at 12:12 AM, approximately 45 prior to the murder, follows:



149. Thirty minutes later, at approximately 12:55 AM, a surviving victim walks on Crescent Street and across the end of the driveway at 57 Crescent Street. TRUJILLO and SEVERINO are crouched behind a vehicle. As the surviving victim is halfway across the driveway, TRUJILLO raises his arms consistent with how a person would aim a gun, then a flash of light appears consistent with a gunshot's muzzle flash.²² TRUJILLO then appears to fire a

²² At the same time, the smaller suspect on the left also stands up, extends his arms consistent with how a person would aim a gun, pointing towards the victim. No flashes are seen coming from the hand area of this suspect.

second round at the surviving victim and the muzzle flash glows from the item in his hands. Still images follow, with TRUJILLO and the muzzle flash outlined in green, SEVERINO outlined in green, and the surviving victim outlined in red:





150. The surviving victim stumbles forward and reaches towards his midsection. The surviving victim runs forward bending at the waist and out of camera view to the right.²³ The smaller suspect then first runs to the left of the vehicle they were crouching behind onto Crescent Street out of view of the camera on 45 Forest Street to the left, followed by the heavier suspect who went to the right of the vehicle they were crouching behind.

iii. 50 Forest Street Surveillance Footage

151. Video surveillance from 50 Forest Street captures the victims walking toward the ambush site on Crescent Street, and the actual murder of Espinal that later takes place at the corner of Forest Street and Crescent Street. Prior to the initial gunshots on Crescent Street, the surviving

²³ In speaking to the surviving victim later that same day, he appeared to investigators to be uninjured and did not report that any of the shots fired at him struck him.

victim (in a sweatshirt that appears gray) and Espinal (in a sweatshirt that appears white) can be seen walking on Forest Street and turning onto Crescent Street. Still images showing the surviving victim and Espinal turning onto Crescent Street follow:



152. Shortly thereafter, Espinal can be observed running down Crescent Street onto Forest Street toward the camera. The same two suspects from Crescent Street have come into view and appear shortly after Espinal does. Espinal can be observed falling and then the smaller suspect raises his arm and what appears to be a muzzle flash can be observed. The smaller suspect then

fires again at Espinal. A series of images follow that capture SEVERINO, believed to be the smaller suspect, firing at Espinal.

- a. Espinal runs into frame, staggers and falls.



- b. The smaller suspect comes into view in pursuit, extends his arm and appears to discharge a firearm at Espinal, who is crawling and blocked from view by a short brick wall.



- c. As Espinal tries to get up, another muzzle flash can be seen consistent with SEVERINO firing another round at Espinal. Espinal still gets up and starts to run.



153. Espinal runs a short distance and then appears to fall again. As he falls, the heavier suspect, believed to be TRUJILLO comes into view and runs toward Espinal. Espinal looks back toward the heavier suspect, believed to be TRUJILLO. Then, TRUJILLO then appears to raise his arms, and Espinal's head immediately falls to the ground and his body slumps. The two suspects initially run toward Crescent Street, but then immediately change directions, turn around and run down Forest Street toward the nearby cemetery and out of camera view. It appears the last gunshot from TRUJILLO struck Espinal in the head and the angle of TRUJILLO to Espinal when this round would have been fired is consistent with the direction of a bullet wound to Espinal's face that was observed at the scene. A series of images follow that capture TRUJILLO, believed to be the heavier suspect, firing at and killing Espinal.

- a. TRUJILLO runs into view as Espinal struggles to get up. Espinal then turns toward TRUJILLO as TRUJILLO raises his arms toward Espinal, consistent with holding a firearm.



- b. Espinal's head then immediately falls to the ground, and his body slumps and falls. The suspects initially turn and run up Crescent Street with SEVERINO, the smaller suspect further up the street, followed by TRUJILLO.



- c. SEVERINO and TRUJILLO then immediately change directions, run toward Forest Street, past Espinal, and to the left out of view of the camera.



iv. Cooperating Witnesses

154. Multiple cooperating witnesses have provided information regarding the murder of Juan Espinal.

- a. CW-3 provided information regarding the murder of Espinal. CW-3 stated that TRUJILLO confessed to committing the murder of Espinal with SEVERINO. SEVERINO also confessed to CW-3 about committing the murder of Espinal. CW-3 stated that TRUJILLO and SEVERINO bragged to CW-3 about committing the murder. CW-3 stated that they described ambushing Espinal as he walked down the street and that TRUJILLO and SEVERINO were aware of where Espinal would be because Espinal was setup by an acquaintance. CW-3 stated that TRUJILLO claimed to have gotten the “kill shot” on Espinal, which is consistent with the surveillance video and physical evidence. CW-3 explained that the basis for the Trinitarios to kill Espinal was because Espinal had assaulted and beat up a Trinitario member a week before the murder, recorded the incident and put it on the internet.
- b. CW-10 provided information regarding the murder of Espinal. TRUJILLO spoke to CW-10 about the murder in roughly 2018. TRUJILLO told CW-10 that Espinal was a member of the rival Shotgun Crips gang and that he was committing shootings at the Essex Street projects, a stronghold for the Trinitarios gang. CW-10 stated TRUJILLO told CW-10 that the leader of the Lawrence Chapter Trinitarios held a meeting where it was agreed that Espinal would be killed. According to CW-10, a lesser Trinitario leader agreed to have his crew handle the murder of Espinal. TRUJILLO told CW-10 that this lesser leader tasked TRUJILLO to kill Espinal. TRUJILLO also explained that SEVERINO was close friends with TRUJILLO and wanted to be a part of the mission to kill Espinal in order to increase his standing and rank within the Trinitarios organization. CW-10 separately spoke with SEVERINO about the murder and SEVERINO confessed to murdering Espinal to CW-10 as well.
- c. CW-17 provided information regarding the murder of Espinal. SEVERINO spoke with CW-17 about the murder and SEVERINO confessed to murdering Espinal with TRUJILLO. SEVERINO told CW-17 that Espinal was a Shotgun Crip and that SEVERINO and TRUJILLO were ordered to kill Espinal by a Trinitario leader. SEVERINO explained to CW-17 that they “were waiting for him at his house because he had gone out somewhere and so they were waiting and when he -- and they were hiding in an alley and when he got there, they just shot him.” This statement is consistent with the physical evidence and surveillance video.

155. Additionally, investigators have learned from multiple cooperating witnesses that SEVERINO obtained a tattoo of the firearm he used to murder Espinal. I have reviewed booking

photos from the Essex House of Correction for SEVERINO and identified a tattoo of a firearm on SEVERINO's wrist. A still image of SEVERINO's commemorative tattoo follows:



B. 11/26/2017, MURDER OF MINDY TRAN

156. I am familiar with the facts concerning the murder of Mindy Tran in Lawrence on November 26, 2017. According to multiple cooperating witnesses, Tran was shot and killed by ELVIS TRUJILLO during an attempted armed robbery of Tran. The order to rob Tran was given to TRUJILLO by a mid-level leader of the Trinitarios (the same mid-level leader of the Trinitarios who ordered the Espinal murder). Tran was lured to the scene under the auspices of a marijuana sale, and TRUJILLO and a coconspirator intended to rob Tran of the marijuana that the mid-level leader intended to sell. During the attempted robbery, TRUJILLO approached Tran who was in the driver's seat of her car. Tran saw TRUJILLO approach, drove at him, and then fired at Tran killing her.

i. Initial Police Response and Crime Scene

157. According to Lawrence Police Report #17008763, and reports related to MSP Case #2017-106-610, on November 26, 2017, at 6:50 PM, officers responded to the area of 45 Hillside Avenue for a report of an unresponsive female in a crashed motor vehicle. Upon arrival, they found an unresponsive Asian female in the driver's seat of a Nissan Maxima. The Nissan had crashed into a parked car. There were gunshot wounds in the victim's left shoulder and back. The victim was subsequently identified as Mindy Tran (DOB: xx/xx/1992) of Lawrence, MA. Tran was transported to Lawrence General Hospital where she was pronounced dead.

158. Crime scene photographs depicting the victim's vehicle follow:



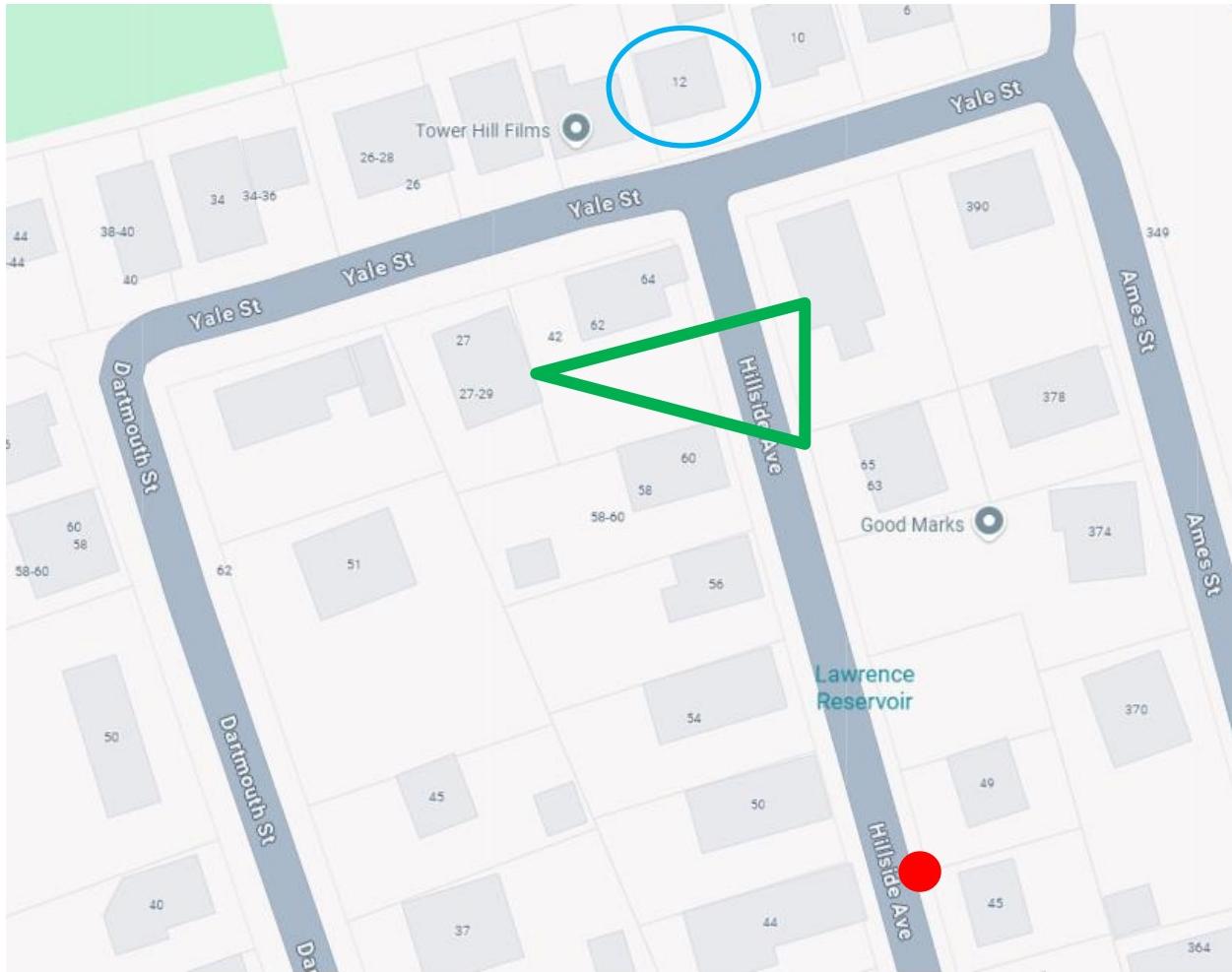
159. A local resident reported having heard a gunshot and observed suspects running to a black car with distinctive characteristics on the windshield that was parked on Hillside Avenue.

160. The victim's car was processed. It contained marijuana packaged for sale, an expended .380 caliber cartridge casing, two cellular phones, and over \$500 in cash. A preliminary search of the phones indicated that one of the phones (Samsung) was the victim's personal phone; and the other phone (iPhone) was used for coordinating marijuana deals with customers.

161. A search of the victim's drug phone revealed a text message conversation with an apparent drug customer. The customer was arranging to meet at 12 Yale Street for an apparent marijuana sale that was supposed to take place within minutes of the victim's murder. 12 Yale Street is approximately 400 feet from 45 Hillside Avenue.

ii. Surveillance Video

162. Investigators obtained surveillance video from a residence nearby. This surveillance video captured a portion of Hillside Avenue in between where Tran's vehicle was at the time of the gunfire, and where Tran's vehicle came to a rest. A map depicting the location of the camera in relation to scene of the gunfire and location where Tran's vehicle was located follows with the camera perspective in a green cone, 12 Yale Street outlined in blue, and the location where Tran's vehicle was found identified by a red circle:



163. The surveillance video depicted a vehicle matching the description provided by a witness, arriving at the scene at approximately 6:40 PM. This vehicle had distinctive markings at the top of the windshield and was later identified to be a Honda Civic. The Honda Civic parked in view of the camera and then shortly later conducted a three-point return and reversed direction, driving past the camera. The vehicle then reversed and parked on the opposite side of the street. Still images from the video follow depicting the Honda Civic arriving and reversing direction follow, with the distinctive white marking on the windshield visible.



164. The Honda Civic then engages in another three-point turn and reverses direction. At approximately 6:42 PM, the Honda Civic continues to the right out of frame of the camera. Light can be observed on the surrounding buildings consistent with the rear lights of the Honda

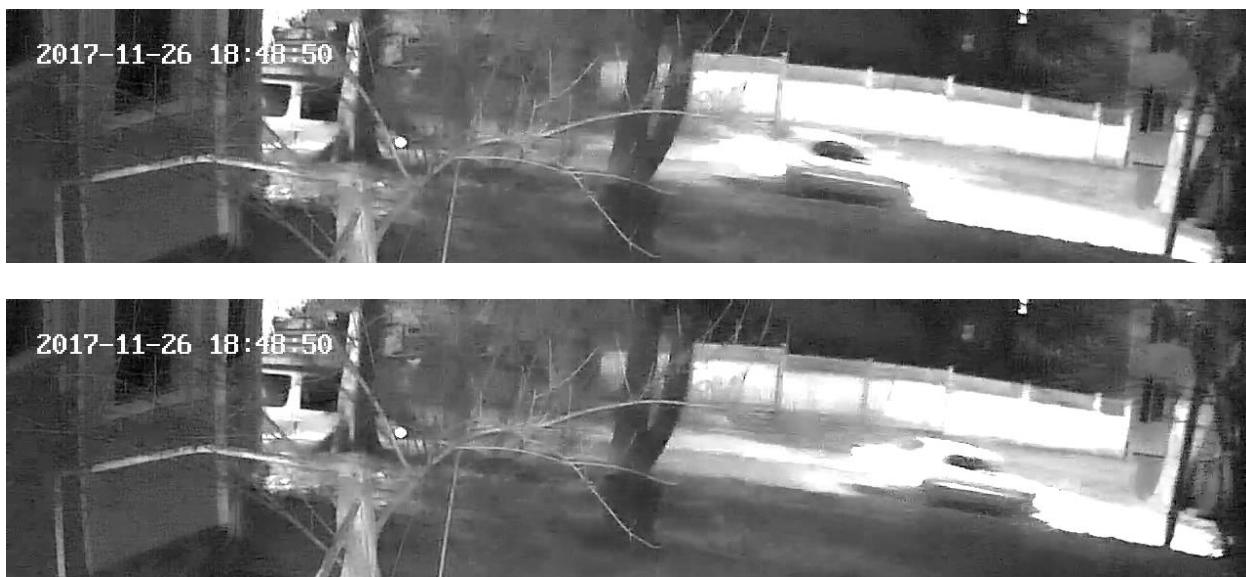
Civic flaring, suggesting that the Honda Civic parked close by out of view. Still images follow depicting this sequence:



165. Approximately four minutes later, at 6:45 PM two figures can be observed walking together up Hillside Avenue from the side of the street where the Honda Civic is believed to have parked to the right of the frame. One of the figures is heavy-set and is wearing light colored pants and a dark sweatshirt. This suspect has been identified to be TRUJILLO. The second figure is smaller in build and is wearing light colored clothing. This second suspect has been identified to be the "coconspirator." These figures cross the street to the far-side from the camera and walk-up Hillside Avenue. The suspects walk out of camera view at approximately 6:46:09 PM. Still images of these figures follow.



166. Then, at 6:48:50 PM, the victim's vehicle then speeds past the camera down the hill to the right of the frame and appears to be on a course to go onto the sidewalk. The vehicle would be found crashed into a parked car approximately two houses down. Still images follow:





167. Seconds after this, the two suspects run from the left of the frame down Hillside Avenue back toward where the Honda Civic is believed to have been parked. The heavier-set suspect in the dark sweatshirt, believed to be TRUJILLO, trails the smaller suspect, known to be the coconspirator, as they run down the hill on the side of the street closest to the camera and out of frame. Still images follow:



168. About 25 second later, lights begin to flare against the building to the right of the camera frame. These flares appear consistent with a three-point turn. Then at 6:49:37 PM, the Honda Civic with visible writing on the windshield can be observed travelling up Hillside Avenue at a fast speed.



iii. Fingerprint Identifies Coconspirator

169. On May 14, 2020, a previously unidentified fingerprint lifted from the passenger-side, rear door of victim's car, had been identified as belonging to the coconspirator.

170. Investigators identified a phone number belonging to the coconspirator at the time of this homicide. Through cross-referencing the phone number of coconspirator with the victim's business/drug iPhone, investigators were able to see that the coconspirator and the victim had multiple contacts, including a call between the two at 5:23 PM on November 26, 2017, approximately one-half-hour prior to victim's murder.

iv. Cooperating Witnesses

171. Multiple cooperating witnesses identified TRUJILLO as the individual who shot and killed Tran during the attempted robbery.

- a. CW-3 stated that TRUJILLO confessed to CW-3 about shooting and killing Tran during the attempted robbery. CW-3 stated that TRUJILLO conducted the robbery at the direction of a lesser leader of the Lawrence Chapter of the Trinitarios. This is the same lesser leader who ordered TRUJILLO and SEVERINO to commit the murder of Espinal.
- b. CW-10 stated that TRUJILLO confessed to CW-10 about shooting and killing Tran during the attempted robbery. CW-10 stated that TRUJILLO conducted

the robbery at the direction of a lesser leader of the Lawrence Chapter of the Trinitarios. This is the same lesser leader who ordered TRUJILLO and SEVERINO to commit the murder of Espinal.

- c. CW-22 stated that TRUJILLO confessed to CW-22 about shooting and killed Tran during the attempted robbery. CW-22 stated that TRUJILLO conducted the robbery at the direction of a lesser leader of the Lawrence Chapter of the Trinitarios. This is the same lesser leader who ordered TRUJILLO and SEVERINO to commit the murder of Espinal.
- d. STATE-CW-1 stated that “Gordo” confessed to STATE-CW-1 about shooting and killing Tran during the attempted robbery. STATE-CW-1 has identified TRUJILLO as “Gordo” who confessed to killing Tran.
- e. STATE-CW-2 stated that “Gordo” shot and killed Tran during an attempted robbery of Tran. STATE-CW-2 stated that the lesser leader of Trinitarios ordered TRUJILLO to commit the robbery with a coconspirator.

C. 3/16/2019, ATTEMPTED MURDER & CONSPIRACY TO MURDER

172. Investigators are familiar with the facts related to a shooting that took place in Lynn, MA on March 16, 2019, that was committed by the Trinitarios outside of the Conga Lounge. According to information from a cooperating witness, LUIS ENRIQUE SANTANA lured a rival gang member to the Conga Lounge by posing as a female on social media and asking the victim to meet outside of the Conga Lounge. That victim was then targeted by DIAZ LIRANZO who shot at the victim’s car that was parked outside of the Conga Lounge. According to a cooperating witness, DIAZ LIRANZO was driven to and from the shooting by PAULA-CABRAL.

i. Initial Police Response

173. According to Lynn Police Report #19017000, at approximately 12:26 AM on March 16, 2019, officers responded to 16 Newhall Street in Lynn, MA for a report of multiple gunshots fired in the parking lot of the Conga Lounge. A victim who is a known TRG associate, who I will refer to as Victim 3, was located nearby who was suffering from a gunshot to the abdomen.

174. As police responded to the scene, a second victim, who is also a TRG member that I will refer to as Victim 4, and a second TRG member that I will refer to as Victim 5, arrived at the Lynn Police station. Officers observed that Victim 4 was suffering from a gunshot wound to the groin. Victim 3 and Victim 4 both survived.

175. Victim 5 provided a statement of what took place. Victim 5 stated he was in the driver's seat of a BMW with Victim 3 in the front passenger seat and JG in the rear. They were parked in the parking lot near Farrar Street and someone started firing at the BMW. Victim 5 stated that he, Victim 3 and Victim 4 all ran from the car and scattered. Officers observed shattered windows and five bullet holes in the BMW that Victim 5 drove to the Lynn Police station. Two projectile fragments were recovered from the BMW.

176. A female witness located at the scene stated that she and her cousin observed the shooting. The witness heard 5 gunshots and saw a muzzle flash and then took cover. The witness stated the shooter was in their early twenties, with light skin, and dressed in all black.

ii. Cooperating Witness Information

177. A cooperating witness provided information on this shooting.

- a. CW-24 stated that this shooting was orchestrated by LUIS ENRIQUE SANTANA. CW-24 stated that LUIS ENRIQUE SANTANA used a fake Snapchat account and pretended to be a woman in order to lure a rival gang member to the Conga Lounge. The rival gang member believed he was communicating with a woman, but in fact was messaging with LUIS ENRIQUE SANTANA. LUIS ENRIQUE SANTANA told the rival gang member that he was in the Conga Lounge and that the rival gang member should pick her up outside of the club. The rival gang member provided the information about his car and his whereabouts.
- b. CW-24 stated that LUIS ENRIQUE SANTANA provided this information to PAULA-CABRAL and DIAZ LIRANZO. PAULA-CABRAL then drove DIAZ LIRANZO to the Conga Lounge and dropped him off to do the shooting. DIAZ LIRANZO shot the rival gang members car and then met with PAULA-CABRAL who picked them up. LUIS ENRIQUE SANTANA listened to the police response real-time with CW-24. CW-24 learned about the details of the

shooting from DIAZ LIRANZO and LUIS ENRIQUE SANTANA a few days after the incident.

D. 9/23/2019, ATTEMPTED MURDER & CONSPIRACY TO MURDER

178. Investigators are familiar with the facts related to a shooting taking place in Lynn, Massachusetts on September 23, 2019, that was committed by the Trinitarios. This shooting, according to a cooperating witness, was committed in retaliation for the shooting of LUIS JEFFREY SANTANA the day before on September 22, 2019.²⁴

i. Initial Police Response

179. According to Lynn Police report #19068271, at approximately 12:10 AM, on September 23, 2019, officers responded to Harwood Street in Lynn for a report of shots fired. Callers reports approximately 20 to 30 gunshots. Officers arrived on scene and located numerous shell casings in the street in the area of 15 Harwood Street and additional casings in the driveway of 32 Harwood Street. Multiple vehicles also appeared to have been struck with gunfire and had bullets holes in windshield and bumpers. In total 32 shell casings were recovered from the area of the reported gunfire, with some being brought to the police station by residents who located the casings after the police cleared the scene.

ii. Cooperating Witness Information

180. According to information from a cooperating witness, LUIS JEFFREY SANTANA was shot on September 22, 2019, and shortly afterward, PAULA-CABRAL called for a meeting. PAULA-CABRAL, ENRIQUE SANTANA, ROMAN and other members and leaders attended the meeting. During the meeting, PAULA-CABRAL ordered the Trinitarios to retaliate, and three

²⁴ I am familiar with Lynn Police Report #19068236, and MSP Report #2019-106-478. Those reports detail the facts related to the shooting of LUIS JEFFREY SANTANA was shot on September 21, 2019, at approximately 9:00 PM. JEFFREY SANTANA was shot in front of Oakwood Avenue in Lynn, MA. As a result of this incident, he faced life threatening injuries that were treated through emergency surgery that saved his life.

vehicles containing Trinitarios went out to find the rival gang members and shoot them. These vehicles proceeded to drive around in a line in order to find the rival gang members.

181. According to the cooperating witness, PAULA-CABRAL drove ROMAN in the one of the vehicles. ENRIQUE SANTANA drove another one of the vehicles. When they located the rival gang members on Harwood Street, PAULA-CABRAL's vehicle was in front. ROMAN got out of PAULA-CABRAL's vehicle and fired a gun in the air in the direction of the rival gang members. Following this, a gun battle then ensued on Harwood Street. ROMAN handed his firearm to another Trinitario who began firing at the rival gang members. The rival gang members fired back. Other Trinitarios in another vehicle then also began firing at the rival gang members.

182. A second cooperating witness stated that ROMAN told the cooperating witness about this shooting. ROMAN told the cooperating witness that the target was AT.

E. 6/24/2021, ATTEMPTED MURDER & CONSPIRACY TO MURDER

183. Investigators are familiar with the facts related to a shooting that took place in Peabody, MA on June 24, 2021, that was committed by the Trinitarios. According to information from multiple cooperating witnesses, members of the Lynn Chapter of the Trinitarios participated in this shooting that targeted rival LCG gang members. The Trinitarios who participated in this shooting were identified to be ALBA, SANTOS, and LOPEZ.

i. Initial Police Response

184. According to Peabody Police Report #21-1987-OF, at approximately 11:03 PM on June 24, 2021, officers responded to 47 Veterans Memorial Drive in Peabody, MA for multiple reports of shots fired. While en route, officers observed a vehicle was observed travelling at a high rate speed, conducted a traffic stop and the occupants ordered to exit the vehicle. The driver told officers that one of the gunshot victims was in the rear of that vehicle.

185. That victim was identified to be a prominent member of the Little Crip Gangsters (“LCG”), who I will refer to as “Victim 1”. Victim 1 appeared to be suffering from a gunshot wound to his groin area and was placed in the rear of the cruiser. Paramedics responded to that location and transported Victim 1 to the hospital. Victim 1 had emergency surgery later that evening and survived. The vehicle from which Victim 1 was rescued was later determined to have three bullet holes.

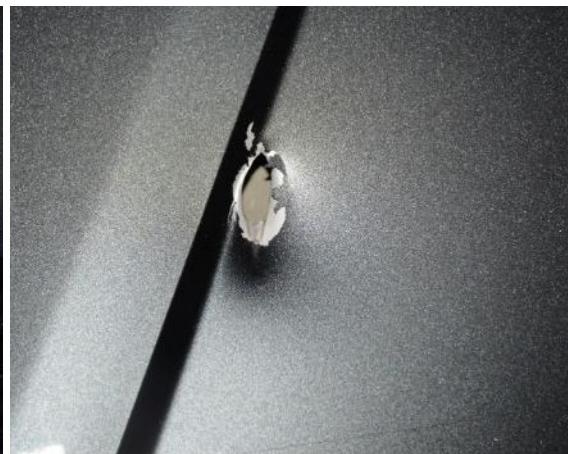
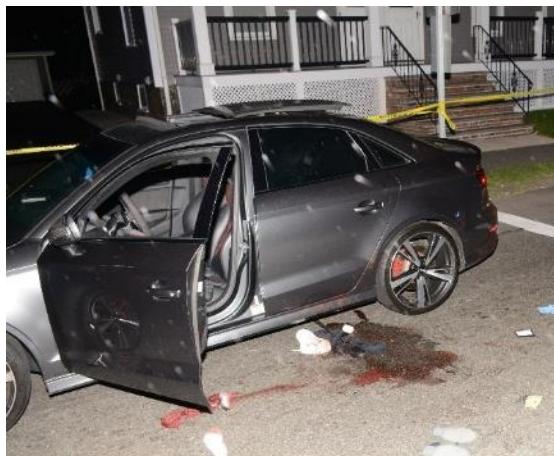
186. Other officers arrived at the scene and were approached by another known member of the Little Crip Gangsters, who I will refer to as Victim 2. Victim 2 informed officers that his girlfriend was struck by one of the bullets. Officers located the girlfriend, observed she was suffering from a gunshot wound to her wrist. Paramedics transported the girlfriend to the hospital for treatment.

187. Multiple persons were interviewed and reported that 3 or 4 shots were fired from a vehicle driving through the parking lot. The vehicle was identified to be a Chevrolet Malibu. Victim 2 informed officers that Victim 2 was released from state prison earlier that day. Victim 2 stated that as he was playing catch in the parking lot, he heard gunshots. Then Victim 2’s girlfriend yelled that she had been hit. Victim 2 refused to tell officers that a vehicle was the source of the gunfire.

188. Victim 2’s girlfriend further described the driver of the Chevrolet Malibu as wearing a mask, but she could see that he was “light-skinned around the eyes.” The girlfriend reported that Victim 2 was behind her during the shooting.

189. Officers and crime scene personnel determined that multiple persons and vehicle had been struck by the gunfire. Blood and debris were observed in the area. From a search of the

crime scene, officers recovered two spent projectiles. No spent casings were recovered. Crime scene photographs depicting the blood and damage to the vehicles follow:



ii. Surveillance Video

190. Surveillance video was obtained that captured the shooting. The video depicted Victim 1, Victim 2 and Victim 2's girlfriend in the parking lot prior to the shooting. At approximately, 11:00 PM, a vehicle drives by and muzzle flashes from gunfire can be seen coming from the rear of the vehicle. Still images from the surveillance follow, with the vehicle visible in the upper right corner of the frame, and a muzzle flash visible in the rear window of the vehicle in the second image:





iii. Cooperating Witness Information

191. Multiple cooperating witnesses provided information about this shooting.

- a. CW-19 provided information about this shooting. CW-19 heard about this shooting after the fact. CW-19 stated that CW-19 learned from WILVING LOPEZ that members of the Trinitarios committed the shooting targeting Victim 1 and Victim 2 in response for JEFFREY SANTANA being shot previously. CW-19 stated that ALBA was the driver during this shooting and that LOPEZ and SANTOS were the shooters.
- b. CW-24 provided information about this shooting. CW-24 stated that ALBA was driving the vehicle at the time of the shooting, and that WILVING LOPEZ and ANGEL SANTOS fired rounds during this incident. CW-24 stated that this shooting was intended to target members of LCG and that the Trinitarios observed LCG members referred to as Victim 1, Victim 2 and another LCG member (CC-10), and conducted the shooting to target them.

iv. Additional Information

192. I am aware that this shooting of Victim 1 resulted in a retaliatory shooting that was conducted by LCG members and associates on Arlington Street in Lynn, MA, on June 29, 2021. During this incident, two victims were shot with fully automatic gunfire that was captured on

surveillance video with audio. In particular, an LCG member who I will refer to as CC-10, is believed to have conducted a shooting on the evening of June 29, 2021, with a fully automatic pistol provided to him by Vincent CARUSO, a/k/a “Fatz.” CARUSO was an LCG associate that was previously prosecuted federally and held accountable at sentencing for this incident.²⁵ A mask, and the weapon used in the shooting were later recovered by FBI during the execution of a search warrant at CARUSO’s grandmother’s house in Lynn, MA, on June 30, 2021. Additionally, numerous threats were broadcast over social by Caruso associate, ERNEST JOHNSON, A/K/A “YO PESCI” in response to the shooting of Victim 1, including one live stream on Facebook on June 25, 2021, during which JOHNSON claimed “there would have been hell to pay” if his “little man,” referring to Victim 1, died,” and that he was putting the rival gang members residences on curfew, implying he would shoot them if he saw them out past a certain time.²⁶

F. 8/5/2021, ATTEMPTED MURDER & CONSPIRACY TO MURDER

193. Investigators are familiar with the facts related to a shooting taking place in Salem, Massachusetts on August 5, 2021, that was committed by the Trinitarios. According to information from multiple cooperating witnesses, members of the Lynn Chapter of the Trinitarios participated in this shooting targeting rival gang members who were encountered at a Wal-Mart in Salem. The Trinitarios who participated in this shooting were identified to be JEFFREY SANTANA, LOPEZ, JORDANI, PAULA-CABRAL, and two other Lynn Trinitarios.

²⁵ See *United States v. Caruso*, Docket No. 21-CR-10312-DJC, ECF #84, p. 10-13 (sentencing memorandum detailing evidence leading up to the retaliatory shooting).

²⁶ See *United States v. Johnson*, Docket No. 22-CR-10103-LTS, ECF #71, p. 15-18, & Exhibit 1 (compact disc containing recording of live stream, “Yo Pesci Facebook - 2021.06.25 - Hell to Pay Video.mp4”).

i. Initial Police Response

194. According to Salem Police Report # 2100019256, at approximately 9:10 PM on August 5, 2021, officers responded to 462 Highland Avenue in Salem, MA, for a historical shots-fired call. Officers responded and spoke to the reporting party who worked for a nearby marijuana dispensary known as Insa.

195. The reporting party stated that there was a shooting that took place at approximately 6:30 PM that afternoon. Officers spoke with a witness to the shooting who stated that he heard ten to twelve gunshots while seated in his vehicle. After reviewing some surveillance video, officers searched the area of Highland Avenue and located approximately 8 shell casings in the area of the 462 Highland Avenue on the outbound lanes heading into Lynn.

196. On August 6, 2021, a victim came to the station and reported that he had been in an altercation at Wal-Mart the day before. Then, as he was driving away, his vehicle, a green Honda Accord, was shot at as he was driving away. The victim and his two occupants were not hit with gunfire. The victim reported leaving his vehicle in the Wal-Mart parking lot. Officers responded to the location, found the victim's green Honda, and observed that it had numerous bullet holes.

ii. Surveillance Video

197. Officers obtained surveillance video from the area and determined that the shooting was largely captured on video. In fact, the shooting appeared to be a coordinated hit upon the victim's vehicle involving three vehicles, that investigators now know were operated by Trinitarios members. The victim's vehicle was a green Honda Accord. The vehicles used by the Trinitarios during the shooting were: a Ford Taurus (containing JEFFREY SANTANA, LOPEZ and SANTOS); a black Honda Accord (containing ROSARIO, and two other Trinitarios who were the shooters); and a black Honda CR-V (driven by PAULA-CABRAL).

198. On August 5, 2021, at approximately 6:00 PM, the victim and a female are observed inside Wal-Mart. They exit around 6:10 PM and walk to the victim's green Honda Accord. Shortly after this, the victim and a second male walk into the Wal-Mart. Once inside, the victims are observed to be in a heated argument with three Trinitario members, who I have identified as JEFFREY SANTANA (wearing a black t-shirt), WILVING LOPEZ (wearing a white sweatshirt) and SANTOS (wearing a black sweatshirt and mask). Still images from the Walmart video showing the altercation between the victims and the Trinitarios, follow with the victims faces redacted.





199. After being told to disperse by the Wal-Mart employees, JEFFREY SANTANA, LOPEZ and SANTOS exit the Walmart, walk to a Ford Taurus that is parked in the fire lane in front of the store and drive to another area of the parking lot. The victims then get into the green Honda Accord and wait for a short period of time before driving out of the parking lot.

200. As the victim vehicle exits the parking lot, the Ford Taurus pulls out of the Wal-Mart parking lot and drives slowly in the right lane of Highland Avenue. The Ford Taurus appears to slow down in front of the victim's green Honda Accord that also just pulled out of Walmart onto Highland Avenue behind it.

201. Simultaneously, a black Honda Accord -- later identified as having been previously owned by JEFFREY SANTANA and then-owned by PAULA-CABRAL's girlfriend -- waited for the gray Taurus and the victim's vehicle to pass. Then the black Honda Accord pulled out of the Wal-Mart parking lot and pulled alongside the green Honda on Highland Avenue. A black Honda CRV also pulls out from the parking lot on to Highland Avenue behind the black Honda.

202. On one video, just as the black Honda Accord is about to pass the victim's green Honda Accord that is on its passenger side, the rear passenger-side window of the black Honda starts to roll down as it passes out of view of the camera. The shooting is believed to take place a few moments later. A black Honda CRV is then observed travelling on Highland Avenue behind

the black Honda Accord; the black Honda CRV reverses into the Insa parking lot and then pulls back onto Highland Avenue. Still images showing this sequence follow:

- a. the green Honda Accord containing the victims is outlined in orange in the first image;



- b. the black Honda Accord on Highland Avenue (outlined in blue) five seconds later;



- c. the third image takes place an instant after the second and is zoomed in to show the window rolling down moments before the shooting;



d. the fourth image depicts the black Honda CRV (outlined in red) reversing into the Insa parking lot preventing traffic from moving forward.



203. The shooting is believed to occur just out of view on the Insa camera to the right of the frame. This area to the right of the camera view is where the shell casings were recovered and vehicles can be seen stopping in traffic, presumably from the shots being fired. The shooting is not captured on video.

204. The black Honda Accord was identified as being the shooter's vehicle. The black Honda Accord was identified as being parked in the Walmart parking lot and that it was parked with the black Honda CRV prior to the shooting taking place.

205. Investigators learned that JEFFREY SANTANA was the prior owner of a black Honda Accord that had been sold to a woman, who I know to be the girlfriend of ENMANUEL PAULA-CABRAL. Further investigation revealed that PAULA-CABRAL was also the owner of a black Honda CRV consistent with the one visible on the video.

206. A search warrant was obtained to seize the black Honda Accord and search it for evidence. On August 17, 2021, this black Honda Accord was located at 33 Laighton Street in Lynn, MA, by Lynn Police who pulled it over. When they stopped and seized the black Honda Accord, JORDANI was driving the vehicle; ROMAN and another known Trinitario member were passengers.

iii. Paula-Cabral Interview

207. On August 31, 2021, after the black Honda Accord was seized pursuant to the search warrant, PAULA-CABRAL came to Salem Police. After being provided with Miranda warning, PAULA-CABRAL gave a recorded interview concerning the black Honda Accord and his whereabouts during the shooting.

208. PAULA-CABRAL claimed that he was in New York at the time of the shooting. PAULA-CABRAL stated that he let the person who Lynn Police stopped in the vehicle (who was JORDANI) and only that person drive the black Honda Accord. PAULA-CABRAL also admitted he drives a Honda CRV and, in contradiction to other statements made, was not travelling on August 5, 2021, and was actually driving the Honda CRV on the day of the shooting.²⁷ When confronted with the fact that the black Honda CRV was visible on video and involved in the incident, PAULA-CABRAL became nervous and requested to have an attorney. The interview was stopped. A still image of PAULA-CABRAL from the recorded interview where he implicates ERY JORDANI ROSARIO as driving the black Honda Accord on the day of the shooting follows:

²⁷ PAULA-CABRAL appeared to be confused as to when the shooting took place and tried to establish an alibi for dates other than when the shooting took place, various claiming to be in New York and in the Dominican Republic, but confirming he had the Honda CRV on August 5, 2021.



iv. Cooperating Witness Information

209. Multiple cooperating witness provided information to investigators about this shooting.
- a. CW-24 provided information about this shooting. CW-24 stated JEFFREY SANTANA reached out to other Trinitarios and informed them that there were rival gang members at Walmart. According to CW-24, WILVING LOPEZ and SANTOS responded to the Wal-Mart to get JEFFREY SANTANA away from the rival gang members. CW-24 stated another car containing Trinitarios coordinated to shoot at the rival gang members as they left the parking lot. CW-24 stated that JORDANI was the driver of the vehicle that fired at the rival gang members. CW-24 stated that PAULA-CABRAL was also present for the shooting in another car and used that car to stop traffic in order for the shooting to occur.
 - b. CW-25 provided information about this shooting. CW-25 learned about this incident from the Trinitario group chat that he was a member of at the time and conversations with the participants after the fact. CW-25 stated that JEFFREY SANTANA encountered rivals while at Wal-Mart and put out a message in the group chat for backup. JORDANI and PAULA-CABRAL responded to the backup call in two cars and participated in the shooting. CW-25 stated that JORDANI was the driver of the first car and another individual was the shooter, along with a third Trinitario. CW-25 stated that PAULA-CABRAL was in the second car and served to block traffic with his vehicle. A few days after the shooting, CW-25 spoke with PAULA-CABRAL, DIAZ LIRANZO and JORDANI at the Trinitario stronghold at 33 Laighton Street in Lynn, MA. While there, they discussed the shooting. PAULA-CABRAL explained that the

incident was a close call and they had to lay low: the vehicle used in the shooting was under a girlfriend's name and had been seized by police. Following this, PAULA-CABRAL wanted to setup a leadership structure to insulate himself.

G. 4/10/2022, MURDER OF TRINITARIO ASSOCIATE

210. I am aware that on April 10, 2022, a Trinitario associate Brian Gomez was murdered behind the Lynn English High School. Alan Bernadin and Nathaniel Mercedat were arrested for killing Gomez. *See Commonwealth v. Bernadin*, Essex Superior Court, Docket No. 2477CR00202; *Commonwealth v. Mercedat*, Essex Superior Court, Docket No. 2477CR00203. I am aware from review of court papers and police reports related to this case that Bernadin and Mercedat are suspected TRG members and that state investigators believe the murder of Gomez was motivated by the ongoing rivalry between TRG and the Trinitarios.

H. 6/12/2022, ATTEMPTED MURDER

211. Investigators are familiar with the facts related to a shooting taking place in Lynn, Massachusetts on June 12, 2022, that was committed by Trinitario member WESTYN LANTIGUA. For this shooting, LANTIGUA utilized a fully-automatic weapon that can be heard on surveillance video in the area. According to information from multiple cooperating witnesses, WESTYN LANTIGUA committed this shooting and intended to target a rival TRG gang member.

i. Initial Police Response

212. According to Lynn Police Report #22038705, at approximately 1:05 AM on June 12, 2022, officers responded to 159 Blossom Street, Lynn, Massachusetts for a report of shots fired. The male 911 caller advised that he had heard several gunshots and upon looking out the window, saw a male firing toward Alley Street. According to the 911 caller, the shooter got into the rear seat of a newer four-door white vehicle parked on Blossom Street and fled toward Alley Street. A second female 911 caller stated that she and her girlfriend had just been shot during a drive-by shooting.

213. Officers responded and located the two female victims in their vehicle, which was a Honda. The victims were observed to have suffered gunshot wounds to the shoulder and the back. Both survived the incident. The victims stated that they had just left the Wendy's drive thru and noticed a white Mercedes Benz with tinted windows. They ate in the parking lot for about twenty minutes and then drove away. As they turned out of the Wendy's, a man armed with a gun got of the driver's door of a white Mercedes parked on Blossom Street. Then the male aimed the gun at them and fired it repeatedly. The victims provided consistent descriptions of the shooter: a light skinned male, approximately 5'10" tall, wearing a gray track suit consisting of gray sweatpants and a gray zippered hooded sweatshirt with the hood up. One of the victims believed the white Mercedes involved in the shooting was the same Mercedes she had seen earlier at the Wendy's.

214. Vehicles parked nearby and an apartment building had also been struck by gunfire. Officers collected fifteen 9mm shell casings that were near a Jeep that was parked in front of the white Mercedes when the rounds were fired. Crime scene photographs follow, depicting the recovered casings marked with yellow evidence placards.



215. The victim's vehicle was determined to have been struck by at least ten rounds. One round struck the front hood. Two rounds had traveled through the front windshield and into the vehicle. Six rounds struck the passenger side of the vehicle with two going through windows

and into the vehicle. One round struck the rear trunk lid and one round skipped off the roof of the vehicle. Still images of the victims' vehicle follow that depict the numerous bullet holes.





216. During the investigation, a Lynn Police Officer reported that he had observed a white Mercedes driving on Commercial Street in Lynn at a high rate of speed at approximately 12:40 AM, twenty minutes before the shooting. The officer observed the Mercedes Park in the area of LANTIGUA's residence on Western Avenue and noted that it did not have a front license plate. That officer ran the rear plate and observed it to be registered to be WESTYN LANTIGUA. While driving by, the officer observed the driver to be WESTYN LANTIGUA, who was wearing a light gray hooded sweatshirt, light gray sweatpants, and a separate dark colored hood over his head. These observations were made approximately twenty minutes before the shooting.

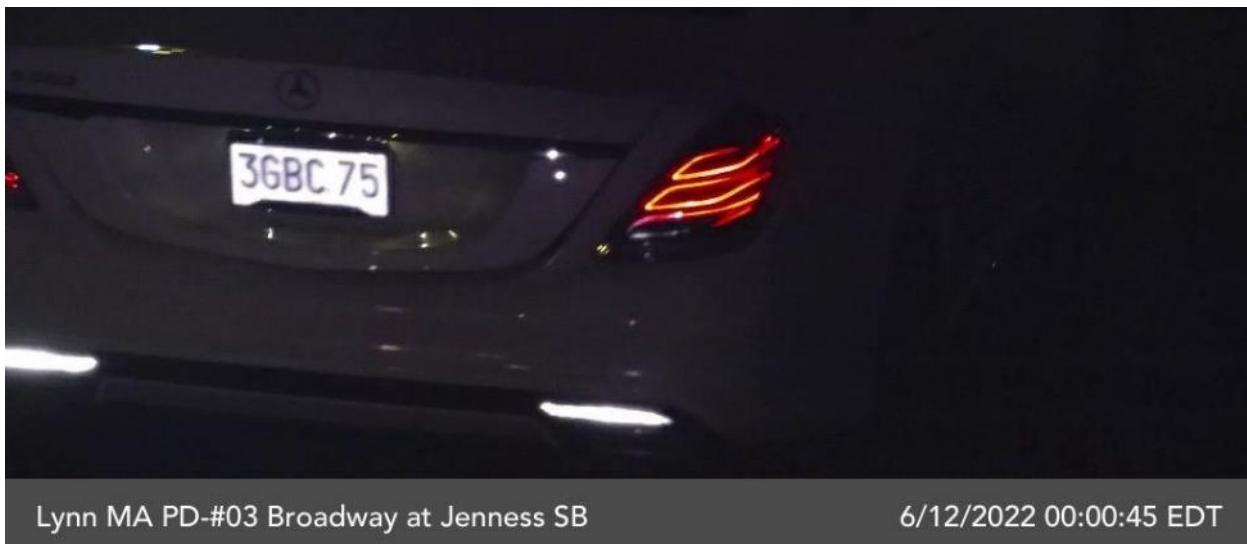
217. On June 15, 2022, the white Mercedes was located parked in the rear of 655 Western Avenue, the same location where the officer had seen the vehicle just prior to the shooting. It was again confirmed that the white Mercedes had no front license plate, tinted windows, a dark colored roof, four doors, and a sticker on the driver's side of the windshield opposite its inspection

sticker. The white Mercedes was then towed, and LANTIGUA, who was inside 655 Western Avenue at the time, provided the keys for the vehicle.

ii. Surveillance Video

218. Investigators reviewed video from numerous surveillance cameras throughout the area capturing the time before and after the shooting on June 12, 2022. Summary information from review of that footage follows:

- a. Surveillance video depicted the white Mercedes making a U-turn in the area of Western Avenue, where it was observed by the officer, and travel toward the location of the shooting.
 - b. Lynn cameras captured the white Mercedes in Lynn, Massachusetts in the area of Broadway at approximately 12:00:45 AM on June 12, 2022.



- c. Video from Wendy's shows the following:
 - i. The white Mercedes is on scene about three or four minutes before the victim vehicle arrives and gets into the drive-thru line. The white Mercedes has tinted windows, no front license plate, and a sticker on the driver's side of the windshield, consistent with the vehicle observed by the officer being operated by LANTIGUA. While the victims wait and travel forward in the drive-thru, the white Mercedes repeatedly drives around the outside lane of the drive-thru. The white Mercedes is outlined in blue in the following still images from the Wendy's drive-thru video:



- ii. The white Mercedes is then observed parking on Blossom Street briefly before it drives away and then returns approximately twelve minutes later. The time frame when the Mercedes leaves and then returns to Blossom Street is consistent with the time frame that the officer observed the Mercedes in front of LANTIGUA's residence on Western Avenue and then returning back to Blossom Street.
- iii. When the white Mercedes returns to Blossom Street, it remains parked until the victim's vehicle exits the Wendy's parking lot and drives towards it. In the distance, the video then shows the shooter exit the driver's door as the victim's vehicle approaches. Flashes consistent with gunfire are then seen.

The shooter then appears to get into the rear driver's door of the vehicle, consistent with the 911 caller, and then drives off. A series of still images of the white Mercedes parked on Blossom Street follow, with the vehicle outlined in blue follow. The images depict the white Mercedes parking across the street (outlined in blue) and then the distant silhouette of the shooter (outlined in green) emerging from the driver's seat when the victims' vehicle (outlined in red) drives past, and muzzle flashes (outlined in orange) as numerous rounds are fired into the victims' vehicle:





- d. Cameras from 164 Blossom Street captured the victim's vehicle driving past the location of where the white Mercedes was parked. The camera does not capture the actual shooting. However, this camera captured audio and the sound of fully automatic gunfire can be heard as the victim's vehicle travels past the white Mercedes. Still images showing the white Mercedes pulling over and parking (outlined in blue) at 12:48 AM, and the victim's vehicle driving immediately prior to the shooting (outlined in red) at 1:05 AM, follow:

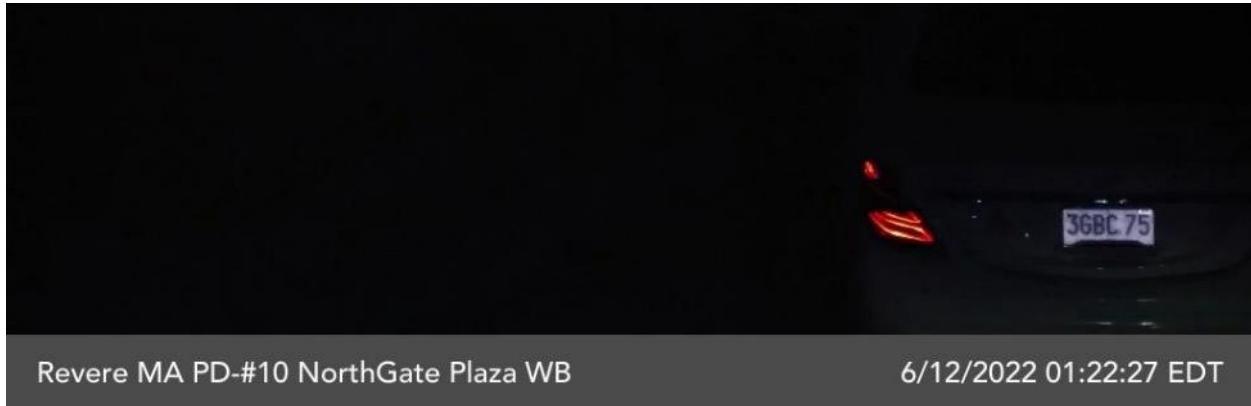


- e. Video surveillance from a business captures the white Mercedes (outlined in blue) pulling over and parking on Blossom Street at approximately 12:48 AM; the silhouette of the shooter (outlined in green) exiting the driver's door at 1:05:28 AM and discharging rounds as the victim's vehicle (outlined in red) approaches. Muzzle flashes (outlined in orange) can be seen in the video as well.



- f. Other video surveillance footage recovered in the case captures the white Mercedes following the victims' vehicle for a short distance after the shooting.

g. Revere cameras captured the white Mercedes in the area of the Northgate Plaza at approximately 1:22 AM.



h. The white Mercedes is then captured on Lawrence cameras at approximately 3:47 AM on June 12, 2022.

iii. Recorded Post-Miranda Interview of Lantigua

219. On June 15, 2022, LANTIGUA came to the station and was interviewed by Lynn Police. The interview was recorded. After being given Miranda warnings, LANTIGUA confirmed that he owned the white Mercedes and that no one else had driven it on June 12, 2022. LANTIGUA claimed that he was driving the white Mercedes with a female on the night of the shooting. LANTIGUA stated that he had gone to Lawrence and that he was in Lawrence at the time the clubs close, which is around 1:00 AM. LANTIGUA also stated that he probably got to Lawrence around midnight. When asked, LANTIGUA declined to provide names of persons who could confirm that he was in Lawrence. LANTIGUA claimed that he left the first female associate and travelled to see a second female associate. LANTIGUA claimed he did not know the names of the females. A still image from the recorded interview where LANTIGUA confirms he was operating the white Mercedes at the time of the shooting follows:



iv. Cooperating Witness Information

220. Multiple cooperating witnesses provided information to investigators about this shooting.

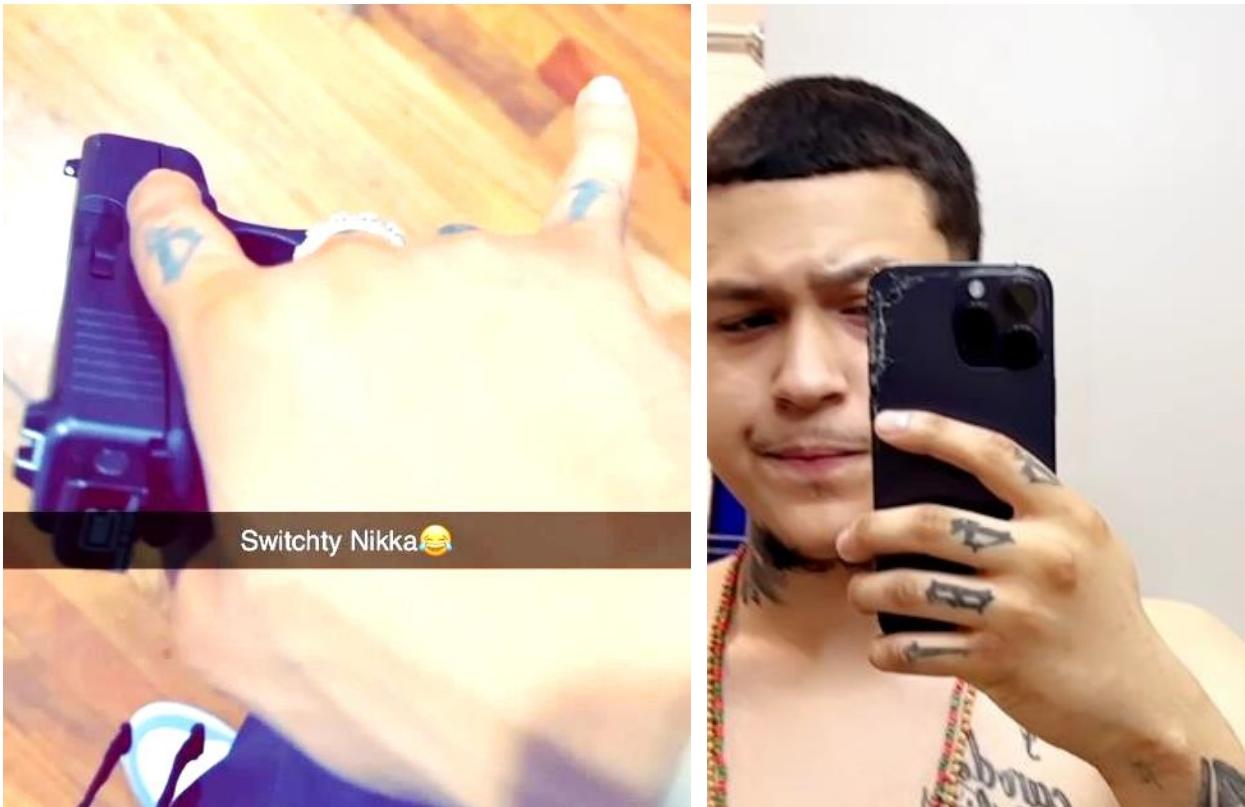
- a. CW-19 provided information regarding this shooting. CW-19 told investigators that LANTIGUA had committed a shooting at Wendy's a few years prior to the interview date. CW-19 stated that LANTIGUA described committing the shooting during a conversation with CW-19, and that the intended target was "Jay Hoodie", a member of TRG.
- b. CW-24 provided information regarding this shooting. When asked about any shootings at Wendy's, CW-24 recalled hearing about a shooting LANTIGUA committed at a Wendy's where LANTIGUA tried to shoot at a rival gang member named "Jay Hoodie." CW-24 learned about this shooting from a Trinitario group chat that CW-24 was a part of at the time of the shooting.

v. Lantigua's Possession of a Fully Automatic Handgun & Control over the White Mercedes

221. In addition to LANTIGUA admitting owning the white Mercedes and it being registered to him, over the course of this investigation investigators have located numerous photographs of LANTIGUA in and around the white Mercedes. Some exemplary photographs follow:



222. In a cellular phone belonging to LANTIGUA that was seized during his arrest in April 2024, investigators located a video of LANTIGUA holding a Glock firearm with a “switch”, that is machinegun conversion device attached to the rear that convert a semi-automatic firearm into a machinegun (IMG_2139.mp4, dated 9/25/23). The caption of the video reads “Switchty nikka” in reference to the selector switch and fully automatic capabilities of the firearm he is holding. LANTIGUA can be identified as the individual holding the machinegun by the “1844” tattoos on his fingers that are visible in the video. A still image from the machinegun video follows first. A second image is a selfie-style image taken by LANTIGUA that depicts LANTIGUA’s finger tattoos of 1844 for reference (this image in a mirror and shows the tattoos seemingly on the opposite hand):



I. 8/17/2022, GROUP CHAT

223. Investigators have reviewed a group chat involving numerous Trinitarios members taking place of the Telegram application. This group chat is not complete and multiple messages and attachments appear to have been deleted. However, from what is discernible in the group chat, it appears that the Trinitarios used the group chat to coordinate violence against rival gang members. Among the members who were part of the group chat were PAULA-CABRAL, JORDANI, SANTOS, SANCHEZ, DARWIN BATISTA, ALBA, ROMAN and a number of unknown Trinitarios. In the chat, the members frequently use Trinitarios language such as “DCN” and “157” and other Trinitario symbols and ciphers.

224. In portion of the group chat taking place on August 17, 2022, it appears that one member identifies a TRG party taking place close to his residence. This member known only as “Ongito” or “Fuga” identifies the party and tells SANTOS to be careful. PAULA-CABRAL asks

exactly where the party is located, and then asks who is active, meaning who is around and available to respond (“Who’s active”). PAULA-CABRAL then tells a Trinitario member named “Fuga” to call him. ALBA then asks what is going. JEFFREY SANTANA then asks what is happening as well. PAULA-CABRAL tells the group that he instructed Fuga to call DIAZ LIRANZO (SOSA) and update him. PAULA-CABRAL then updates the chat participants that there are rival gang members around ENRIQUE SANTANA’s residence (“There are some penelos around Chikito”) and identifies one of the rival gang members as “J Hoodie.” JEFFREY SANTANA replies that SANTOS has a firearm with a thirty-round magazine (“Biggy has his 30”). A Trinitario named “Kaki” then states that a member named “Gio” is in Lynn and has a firearm with a thirty-round magazine as well (“Gio is in Lynn and has the 30”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED
Ongito	Supposedly the TRG have
Ongito	A party
Ongito	In front of my house[,] Biggie be careful
Ongito	Around there
PAULA-CABRAL	What do you mean [,] exactly where?
Ongito	In front of Broad
SANCHEZ	KI7
Ongito	In front of my house
Ongito	Everybody is asleep
Kaki	Bro [,] I’m active [,] But I’m on foot [,] I’m in Boston [,]
Ongito	What’s up [?] The party is ending and people are leaving from there
PAULA-CABRAL	Who’s active
PAULA-CABRAL	Fuga call me
ALBA	What’s up
Kaki	What’s up bro [,] everything
Kaki	Good
JEFFREY SANTANA	The brothers are good
JEFFREY SANTANA	What’s going on?
PAULA-CABRAL	I told Fuga to call Sosa [,] let him know then
JEFFREY SANTANA	What do you need
PAULA-CABRAL	There are some Penelos around Chikito its J Hoodie
JEFFREY SANTANA	But Biggy has his 30
JEFFREY SANTANA	And John Flow
Kaki	Gio is in Lynn and has the 30

Kaki	Brother Nelfew New
JEFFREY SANTANA	There you go
SANTOS	I'm in Providence
JEFFREY SANTANA	And John Flow is with you
PAULA-CABRAL	Kakilo call Sosa and send him Gio's number

225. Another conversation takes place the following day on August 18, 2022. During this conversation the Trinitarios discuss a party where rival gang members were in attendance. They first debate whether the rivals were with the Gangster Disciples ("GD") of Latin Kings ("Lo King). SANTOS then sends a photograph of three individuals, believed to be rival gang members and states to the group "Look" at the gang colors they are wearing, which are "Black and yellow", consistent with the Latin Kings' colors. Ongito then tells the group that they were at a location where they would be targeted, because the Trinitarios have issues with everyone, and are wearing their gang colors and are grouped together ("you're at a place where you're gonna get hit [,] because we have issues with everybody [,] and we have the colors on and we are grouped together"). JEFFREY SANTANA tells the Trinitarios to stay away from the location where the incident occurred ("Don't go to the spot and that's it"). Ongito agrees and states that if they are going to be outside showing their gang colors, they should avoid getting into arguments because incidents will occur due to the Trinitarios having issues in many parts of the city ("want to be outside showing the colors [,] there is no reason to be arguing that and more is going to happen because we have issues everywhere"). JEFFREY SANTANA then states that for the next altercation, the Trinitarios need to communicate better ("for the next time if there is another altercation[,] there should be better communication"). SANTOS then confirms that he was at the incident, that there was a shooting, and the rival gang members shot first ("You guys are talking about that nobody told you anything [,] and the other group shot first [.]. Let's see if they were going to tell you [,] no we are going to shoot [,] get out of the way"). Kaki then adds context that SANTOS approached the rival gang members first, insinuating that SANTOS instigated the

shooting (“Brother [,] with all respect [,] you went to them”). And SANTOS confirms that the rival gang members shot first (“And they shot at us”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED
Kaki	And I was with Punto 7 last night and he says it was GD and you say that it was Lo King
Kaki	Finally[,] who was it
Kaki	But starting today I’m not going to say anything because at the end I always end up
Kaki	Bad
Kaki	Or that I’m crazy
SANTOS	[PHOTO OF RIVAL GANG MEMBERS]
SANTOS	Look
SANTOS	Black and yellow
Ongito	Me neither bro [,] you’re at a place where you’re gonna get hit [,] because we have issues with everybody [,] and we have the colors on and we are grouped together
Ongito	Everybody is good [,] I imagine we learned from that
Ongito	The majority of the guys are learning that that and more is what’s always going to happen
Ongito	That’s not it
Ongito	Beautiful brother [,] look what it is
JEFFREY SANTANA	Don’t go to the spot and that’s it
JEFFREY SANTANA	Are we going to keep doing the same everyday
JEFFREY SANTANA	And be thankful everybody is good
Ongito	You want to be outside showing the colors [,] there is no reason to be arguing that and more is going to happen because we have issues everywhere
Ongito	Hang out separately. With us [,] and nobody else [.] That’s it
Ongito	Or party where you’re not exposing your life
Ongito	We are here we can’t return it
JEFFREY SANTANA	We are son of God[,] for the next time if there is another altercation[,], there should be better communication[,] but just drop that
SANTOS	You guys are talking about that nobody told you anything [,] and the other group shot first [.] Let’s see if they were going to tell you [,] no we are going to shoot [,] get out of the way
Kaki	Brother [,] with all respect [,] you went to them
SANTOS	And they shot at us

J. 2/21/2023, ATTEMPTED MURDER & CONSPIRACY TO MURDER

226. Investigators are familiar with the facts related to a shooting taking place in Lynn, Massachusetts on February 21, 2023, that was committed by Trinitario members ABEL SEVERINO REYES and DARWIN BATISTA. According to multiple cooperating witnesses, REYES was the driver of the vehicle used in the shooting and DARWIN BATISTA fired numerous rounds at a vehicle believed to be used and occupied by rival gang members. Multiple cooperating witnesses have provided information that JUSTIN ALBA sent a photograph of the victim vehicle to the Trinitario group chat and identified it as being used by rival gang members, which led to it being targeted.

i. Initial Police Response

According to Lynn Police Report #23011808, on February 21, 2023, at approximately 11:37 PM, officers responded to the area of Chestnut Street, Stephens Street, and Memorial Park following reports of gunfire and persons reporting being shot at in their vehicle. Officers located the victims and observed that one victim was struck by a bullet in her hand while another suffered two grazing wounds to her back and shoulder. The victims reported being fired upon by individuals in a white Honda Accord which they claimed was following them before the shooting. The victims reported that the shooting took place near Autumn Street and Stephen Street, but they had driven to Memorial Park to get away from the vehicle that fired at them.

131. Upon arriving at the scene of the shooting, police recovered fourteen (14) 9mm shell casings. In addition to the victims' vehicle, another vehicle parked on Stephen Street was also struck by the gunfire. The casings were recovered at the intersection of Autumn Street and Stephen Street. A photograph depicting some of the recovered casings follows:



227. Investigators also searched the victims' vehicle and determined that five of the rounds struck the victims' vehicle. Photographs taken after the shooting show the impacts of the bullets into the front windshield, passenger side window, rear taillight, as well as the passenger side door and panel. Additional photographs display blood and debris within the victims' vehicle.





ii. Surveillance Video

228. Investigators obtained surveillance video that depicts the victims' vehicle traveling on Autumn Street while being followed by a white sedan consistent with a Honda Accord. The victims' vehicle (outlined in red) and the trailing Honda Accord (outlined in blue) can be observed in the following image from the surveillance video:



229. The Honda Accord does not follow the victims' vehicle as it turns right. As the victims' vehicle turns right, the body of the front passenger in the Honda Accord can be observed

extending out of the window in a manner consistent with firing a weapon toward the victims' vehicle that is now on Stephen Street and to the right of the white Honda. The following still image, depicts the arm of the front passenger of the Honda Accord.



230. Video from Stephen Street shows the victims' vehicle, and captured audio of the gunfire that is consistent with a semi-automatic weapon.

231. When the suspect vehicle travelled on the Lynnway from Broad Street, a camera identified it as having license plate 4EKG54. The plate 4EKG54 is registered to a 2020 white Honda Accord that is consistent with the victim's description of the suspect vehicle including having identical five-spoked spiral rims. The 2020 white Honda Accord bearing Mass. registration 4EKG54 was later determined to have been operated by ABEL SEVERINO REYES during a traffic stop by Lynn Police that took place on March 13, 2023.

iii. Cooperating Witness Information

232. Multiple cooperating witnesses provided information concerning this shooting:

- a. CW-12 provided information concerning this shooting. CW-12 stated that ALBA posted a photograph of the victims' vehicle to the Trinitario group chat and identified it as being used by rival gang members. CW-12 learned that

ABEL SEVERINO REYES was driving with DARWIN BATISTA, when they located the vehicle and that BATISTA opened fire on the vehicle. CW-12 stated that REYES and DARWIN BATISTA told CW-12 about committing this shooting.

- b. CW-16 provided information regarding this shooting. CW-16 stated that ABEL SEVERINO REYES was driving the Honda Accord during this shooting and that DARWIN BATISTA fired at the victims' vehicle. CW-16 stated that DARWIN BATISTA fired at the victims' vehicle because ALBA had sent a photograph of the vehicle to the group chat and identified it as being used by rival gang members.
- c. CW-19 provided information regarding this shooting. CW-19 learned from DARWIN BATISTA that DARWIN BATISTA was the shooter during this incident on February 21, 2023, and that ABEL SEVERINO REYES was the driver.
- d. CW-25 provided information regarding this incident. CW-25 stated that ALBA sent a photograph of the victims' vehicle in the group chat and identified it as being used by rival gang members. CW-25 stated that according to information learned from another Trinitario member, REYES was driving and DARWIN BATISTA fired at the vehicle. CW-25 also learned that MILIANO and VALLECILLO were in a second car that was also involved. According to CW-25, the firearms were dropped by the shooters and retrieved by other Trinitarios. CW-25 knew that SANTOS gave the "green light" to conduct the February 21, 2023, shooting.

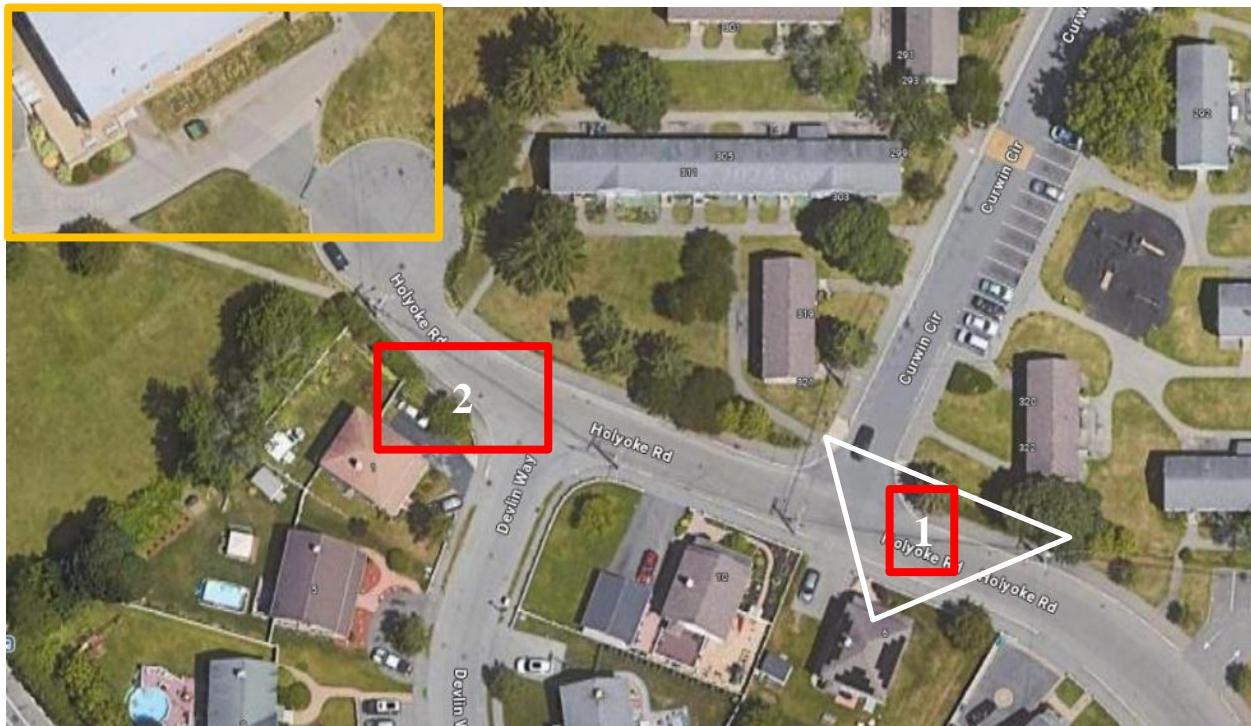
K. 5/7/2023, ATTEMPTED MURDER & CONSPIRACY TO MURDER

233. Investigators are familiar with the facts related to a shooting taking place in Lynn, Massachusetts on May 7, 2023, that was committed by Trinitario members MICHAEL MILIANO and DARWIN BATISTA. According to multiple cooperating witnesses, this shooting took place because rival gang members fired at a vehicle being operated by other Trinitario members in rival gang territory in Curwin Circle. Additional Trinitarios were also in the rival gang territory on foot to target and shoot at the rival Westside World gang members. MILIANO and DARWIN BATISTA were on foot ,observed the incident, and then fired at the rival gang members in response.

i. **Initial Police Response**

234. According to Lynn Police Report #23029384, on May 7, 2023, at approximately 11:47 PM, multiple 911 calls reported the sound of gunfire in the area of Curwin Circle. One caller reported that the gunfire sounded like it was an automatic weapon. Officers responded and spoke with the callers and attempted to locate evidence of the shooting and surveillance video. Based on recovered casings and surveillance video, two crime scenes were identified a short distance apart.

235. A map of the area follows, with the surveillance video location and perspectives depicted by a white triangle, the location of recovered casings outlined in red with number 1 and 2, and the green dumpster and Callahan School outlined in orange:

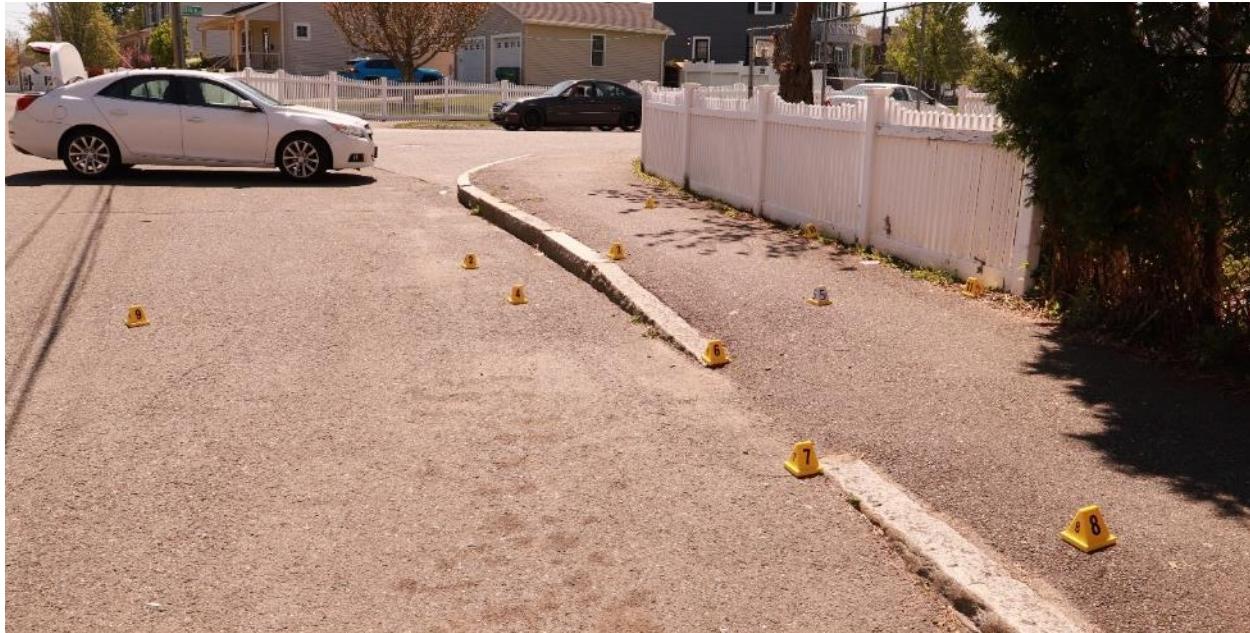


236. At the intersection of Curwin Circle and Holyoke Road (marked 1 in the map), officers located one shell casing. This location was covered by surveillance video that was recovered. A still image follows:



237. At the intersection of Devlin Road and Holyoke Road (marked 2 on the map), officers located fourteen shell casings. These casings were in two different calibers, 9mm and .40 caliber, suggesting two different shooters. This location was not covered by surveillance video. Two live .40 caliber rounds were also recovered.





ii. Surveillance Video

238. Investigators obtained surveillance video that depicts the gunfire taking place at the intersection of Devlin Way and Holyoke Road. The video depicts three individuals (outlined in blue) walking through the front yard of a residence facing Curwin Circle.

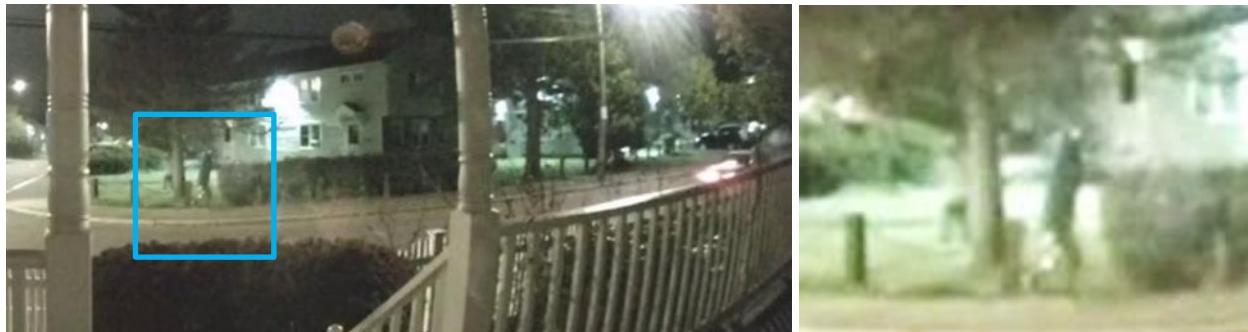




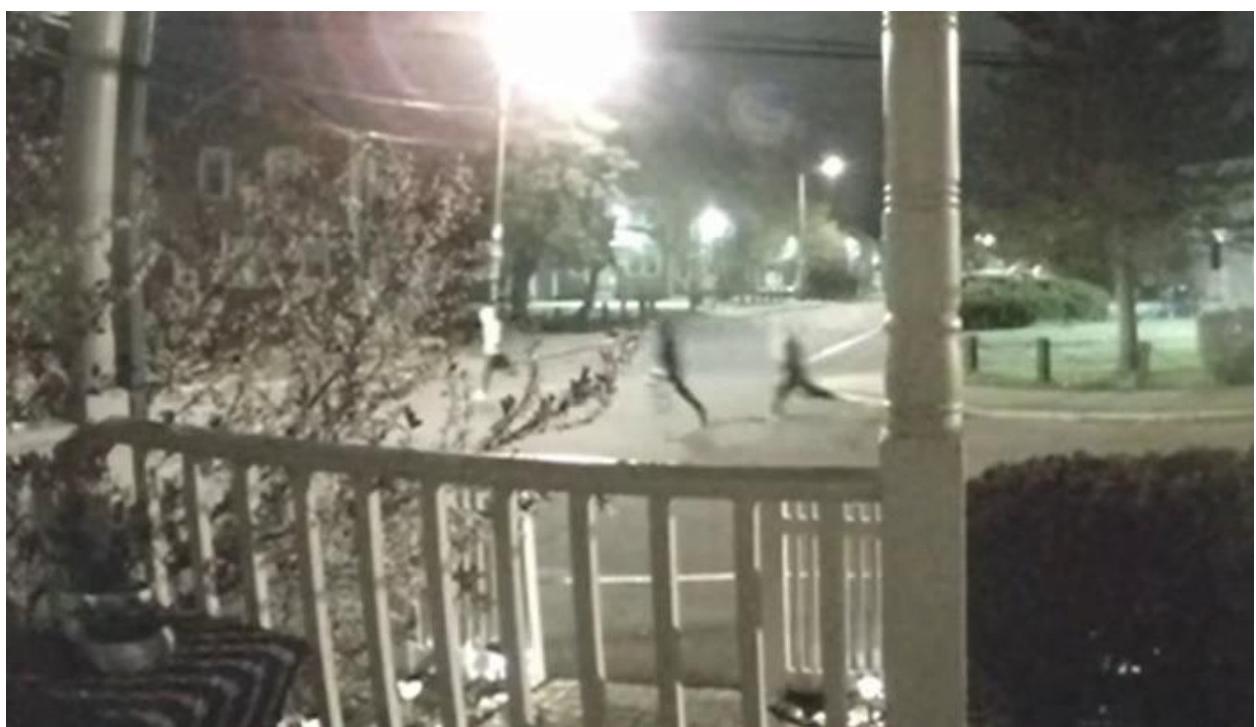
239. As these two individuals walk toward the intersection with Holyoke Road, a vehicle can be seen approaching from Curwin Circle toward the intersection where the individuals are concealed behind bushes and vegetation.



240. As the vehicle approaches, the three individuals emerge from the left of the bushes, one jumps over the barrier, and steps onto the street and extends his arms as if holding a firearm, pointing it in the direction of the vehicle.



241. The three individuals then run in the opposite direction from the vehicle's path of travel down Holyoke Road toward Devlin Way and the Callahan School.



242. Video recovered from the Callahan School depicts multiple individuals going behind the dumpster who appear to be changing clothing and congregating. This video is from the direction of where the three individuals ran after firing at the vehicle.



iii. Cooperating Witness Information

243. Multiple cooperating witnesses provided information concerning this shooting.
- a. CW-12 provided information concerning the May 7, 2023, shooting. CW-12 stated this was a shooting where the Trinitarios were targeting Westside World. CW-12 stated that MILIANO and DARWIN BATISTA were the shooters and two other Trinitarios were there as well. According to CW-12, two other Trinitarios drove through Westside World territory, which is the Curwin Circle area. While driving by, they were shot at by members of Westside World. According to CW-12, MILIANO and DARWIN BATISTA saw this happening because they were walking by in the area. Upon seeing Westside World members shoot at the car, MILIANO and DARWIN BATISTA opened fire at the rival gang members. CW-12 learned about this shooting from statements made by MILIANO, DARWIN BATISTA and the other participants, who discussed this shooting in the Trinitarios group chat shortly after it took place.
 - b. CW-13 provided information concerning this shooting. CW-13 stated that DARWIN BATISTA and MILIANO had a rental car and drove to the Westside World territory to shoot them. Once they arrived, Westside World gang members saw the car and fired at them. DARWIN BATISTA and MILIANO told CW-13 about the shooting.
 - c. CW-19 provided information concerning this incident. CW-19 stated that VALLECILLO fired at Westside World gang members during this incident with a firearm equipped with a selector switch. CW-19 heard that Daniel Marquez, DARWIN BATISTA, MICHAEL MILIANO, and ABEL

SEVERINO REYES, were also present for this shooting. CW-19 heard about this shooting from SANTOS.

iv. Digital Data

244. Investigators reviewed a conversation between MILIANO utilizing his Instagram account (username: el_domiii53) and an unknown rival gang member (FNU) (username: ahahahshhshesh) taking place from January 2024, through March 2024. During the conversation, they exchanged threats, discussed the violent acts that they were responsible for, and insulted one another and their respective gangs. During one part of the conversation in January 2024 and February 2024, MILIANO and FNU discussed historical incidents of violence. MILIANO stated that he is more “active”, meaning violent, and referred to a situation where he obtained the residence of a Westside World gang member by following a car (“you better find out who owns that car and you’ll know what idiot it was that took me to his niggas house”). MILIANO also mocked FNU and instructed him to not just brag about hitting rival gang members, but should only brag about killing them (“don’t hit your enemies, kill them”).

245. MILIANO then referred to the May 7, 2023, incident stating that when he entered the Westside World territory (“block”) they always run, and that FNU should ask his associates about the time he went to Westside territory and they shot at his car (“wsw and your same block, they shot them. my car”), but then MILIANO turned the tables and had the Westside World gang members running (“you enter my block and you are the ones who run away, I enter your blocks and you run away, you always run, oh, ask your black people if they remember when I enter ah wsw and your same block, they shot them. my car and somehow I turned on the sun from behind and they ran faster than they could”). A portion of this conversation follows:

AUTHOR	CONTENT
MILIANO	What you have to do is come find me.
MILIANO	black, I’m more active than you, ask all your blacks to see who the idiot was that took me to his friends house.

MILIANO	Don't you better find out who owns that car and you'll know what idiot it was that took me to his niggas house
FNU	i know where your at
MILIANO	come find me 🤣🤣🤣
FNU	why you hiding tho
FNU	what you jack
FNU	popo k
MILIANO	Come and do your homework, I'm ready and I'll finish mine
FNU	i just beat your nigga up
MILIANO	you have nothing to do, start making money
MILIANO	and you make me laugh, the black guy just hit me, you're wrong, stop hitting innocent people and look what a child you are, don't hit your enemies, kill them
FNU	show me 1000
MILIANO	you like it, right 🤣😂🤣
FNU	hell no that shit is caca you niggas can't do anything right
FNU	you not crip k you didn't do anything little boy you just watch your big bro do everything then you talk about it , watch when they find out your a little fed boy they finna kick you off the block
MILIANO	No, I am nothing, I have never given a blow in my life, I am a little boy, well, you know it very well, you know everything about me. 😂🤣🤣
MILIANO	🤣🤣😂😂🤣 bro you talk a lot of shit who's going to take me out of my block I was born on that fucking block literally nigga 😂🤣 you had to go back 14 years for you to see me playing
MILIANO	To you, if no one knows you, nigga lady, try to come back to my block and you'll see how it is, you won't have time to run 😂🤣😂😂🤣
MILIANO	That's one of the differences between us, you enter my block and you are the ones who run away, I enter your blocks and you run away, you always run, oh, ask your black people if they remember when I enter ah wsw and your same block, they shot them. my car and somehow I turned on the sun from behind and they ran faster than they could 😂🤣😂😂🤣

L. 7/23/2023, ATTEMPTED MURDER & CONSPIRACY TO MURDER

246. Investigators are familiar with the facts related to a shooting that took place in Lynn, MA on July 23, 2023, that was committed by Trinitario members ANGEL SANTOS, and RICARDO BRATINI-PEREZ. According to multiple cooperating witnesses, this shooting arose because a rival gang member, who I have referred to previously as Victim 2, was observed outside

of a restaurant. After learning of Victim 2 being outside of the restaurant, SANTOS and BRATINI-PEREZ proceeded to the location and BRATINI-PEREZ opened fire at Victim 2.

i. Initial Police Response

247. According to Lynn Police Department report #23048851, on July 23, 2023, at approximately 3:47 PM, police officers responded to 911 calls for reports of a drive-by shoot in the area of 106 Union Street in Lynn. This is the area of Estefani's Restaurant. The 911 calls identified that multiple shots were fired at a group of people and that witnesses observed a black SUV that appeared to be the car where the gunfire had come from. Witnesses stated that upwards of five gunshots were heard.

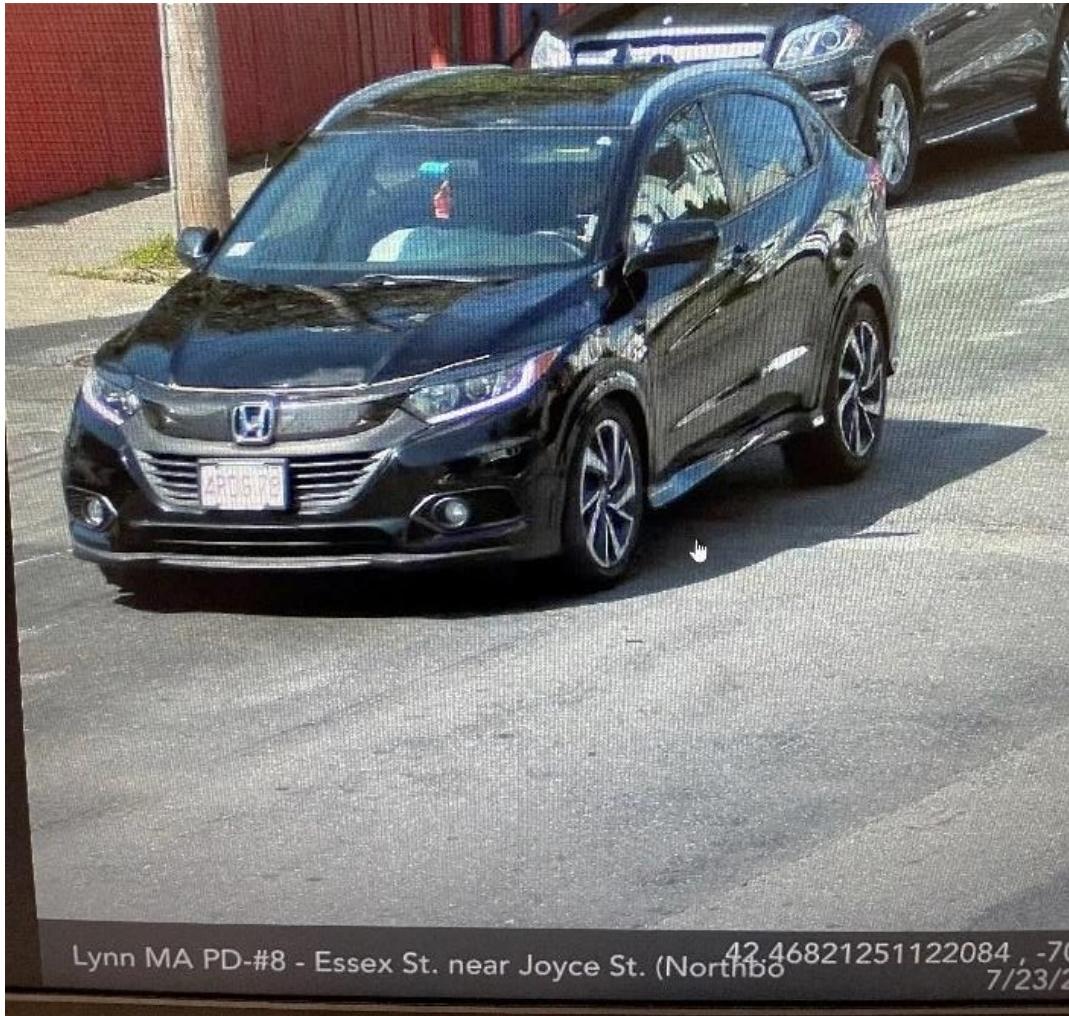
248. Upon arriving at the scene of the shooting, police recovered three shell casings which were later identified as 9mm shell casings. These casings were located at 9 Green Street a short distance from Estefani's restaurant and the intersection of Union Street and Green Street. No damage was observed to any businesses or vehicles and no persons reported being injured.

249. During their investigation in the minutes immediately following the shooting, a witness who asked to remain anonymous spoke with police and stated she observed the shooting. In her interview with police, the anonymous witness stated that one of the individuals in the crowd who was fired at was a member of the Tiny Rascal Gang ("TRG"), who I have previously referred to in this affidavit as JS. The witness further stated that she witnessed the SUV, what she believed was a black Honda CRV, corroborating the statements of other witnesses. Police believed that Victim 2 was the target of a shooting conducted by rival gang members.

ii. Surveillance Video

250. In their investigation following the shooting, police located the suspect vehicle using local cameras. The suspect vehicle was identified to be a black 2019 Honda HRV bearing a Massachusetts license plate #4RDG78.

251. At approximately 3:40 PM on July 23, 2023, the vehicle had driven past a stationary camera at Essex Street and Joyce Street in Lynn, and the vehicle was photographed. A photograph of the suspect vehicle is noted below.



252. Video Surveillance from Estefani's restaurant depicts the black Honda HRV on two cameras. The first camera captured the black Honda HRV traveling at a high rate of speed through the intersection of Green Street and Union Street, onto Green Street and past Estefani's restaurant. A still image of the black Honda HRV (outlined in blue) passing the intersection of Green Street and Union Street at 3:46 PM (timestamp not adjusted), immediately prior to the shooting follows:



253. The second camera captured the black Honda HRV on Green Street as it nears a grey BMW bearing license plate # 4ETM74, it slows down, and the group gathered near the BMW disperses and flees onto Union Street. According to the police report, the gray BMW depicted in the image is believed to be owned by JS. Additional video footage captured groups of people fleeing from Green Street towards Union Street in the moments after the shooting. A series of still images from the surveillance video follow that depict the black Honda HRV (outlined in blue) and gray BMW (outlined in red), and location where the shell casings were recovered (outlined in green) in the moments of the gunfire follow:





iii. Cooperating Witness Information

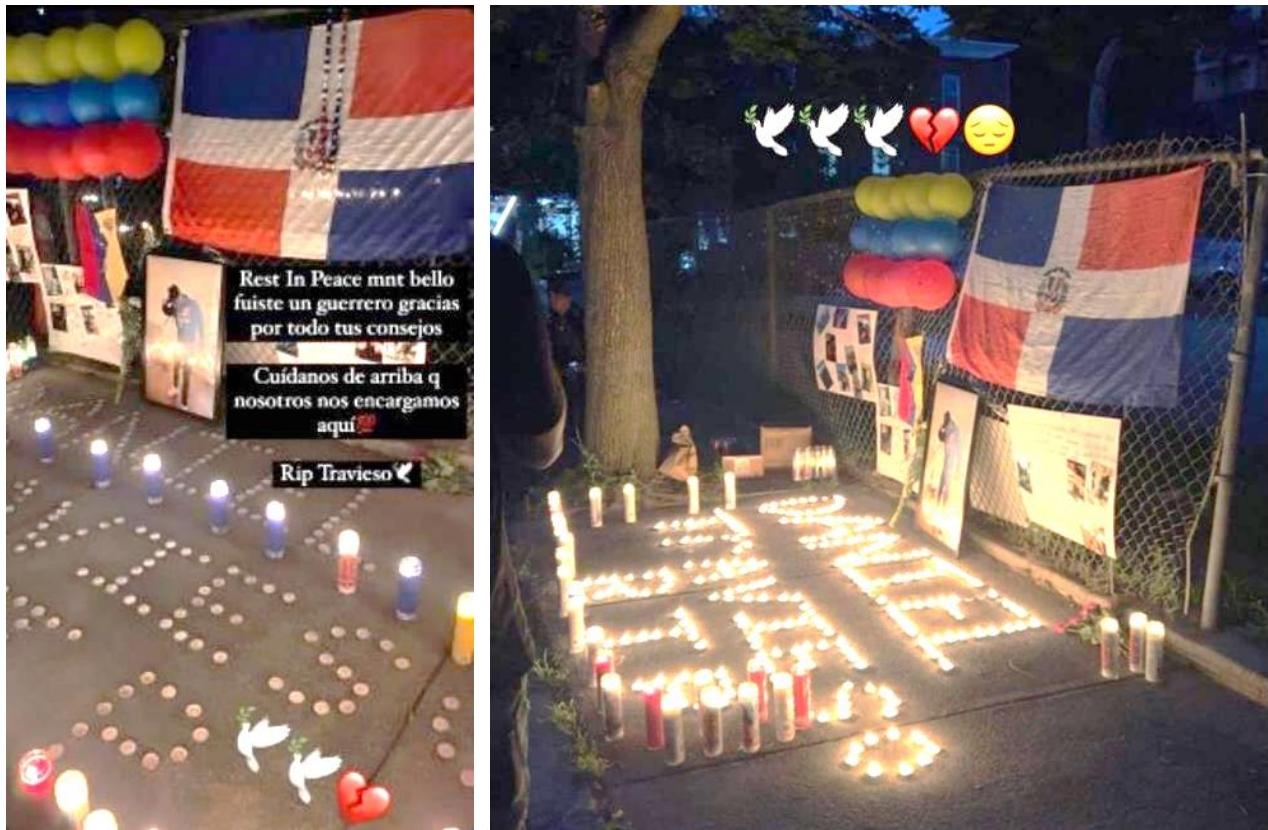
254. Multiple cooperating witnesses provided information on this shooting.
- a. CW-12 provided information about this shooting. CW-12 stated that WARLY RUIZ drove past Estefani's restaurant on Union Street and observed a rival gang member that I have previously referred to as JS. RUIZ reported seeing Victim 2 on the Trinitario group chat and sent a photograph of Victim 2 to the group chat. According to CW-12, multiple leaders including PAULA-CABRAL, ROSARIO, ALBA, and DIAZ-LIRANZO were all in the chat where this was talked about. According to CW-12, approximately ten or twenty minutes after the photograph was sent to the group chat by RUIZ, SANTOS and BRATINI-PEREZ drove by Estefani's Restaurant and BRATINI-PEREZ shot at JS. SANTOS reported in the group chat that the shooting was completed. CW-12 stated that SANTOS also told RUIZ about the shooting in person. SANTOS told RUIZ that he had been driving and BRATINI-PEREZ suggested they shoot Victim 2, so they went and got a firearm and then drove back to where Victim 2 was. Then, BRATINI-PEREZ shot at Victim 2.
 - b. CW-19 provided information about this shooting. CW-19 stated that BRATINI-PEREZ and SANTOS shot at Victim 2 in front of Estefani's restaurant in Lynn.
 - c. CW-25 provided information about this shooting. CW-25 stated that BRATINI-PEREZ described committing this shooting to CW-25 on multiple occasions. CW-25 stated that BRATINI-PEREZ stated he was with SANTOS when they drove by Estefani's in Lynn on Union Street. Both SANTOS and BRATINI-PEREZ saw a rival and BRATINI-PEREZ suggested they should shoot him. BRATINI-PEREZ did not have a gun and SANTOS told BRATINI-PEREZ that they should go pick one up. They went and retrieved a gun and then BRATINI-PEREZ shot at the rival.

M. 8/22/2023, MURDER OF DANIEL MARQUEZ & POSTHUMOUS INITIATION

255. On August 22, 2023, a probationary member of the Trinitarios named DANIEL MARQUEZ, A/K/A “TRAVIESO” was murdered in Lynn, Massachusetts. MARQUEZ was stabbed during a fight against rival gang members in a convenience store. Present for the incident were YEFERSON CAMBAR VALLECILLO, A/K/A “ILLUMINATI” and CARLOS JAVIER RAMIREZ CORNIELLE, A/K/A “KREEPY.” At the time of the murder, MARQUEZ was seventeen years old.

256. This murder was captured on video from inside the convenience store. One individual involved in the fight was charged with MARQUEZ’s murder, specifically, IRAM ALLEN who I know to be an associate of the Tiny Rascals Gang. *See Commonwealth v. Iram Allen*, Essex Superior Court, Docket No. 2377CR00479.

257. MARQUEZ was a particularly active probationary member and had already committed at least one shooting earlier in 2023, prior to his murder. Following his death, the Lynn Trinitarios setup a full memorial for MARQUEZ near the site of his death, complete with a Trinitario beaded necklace hanging from the Dominican flag. Still images of that memorial follows:



258. A video recovered from a cellular phone used by SANTOS depicts this memorial and pans to two firearms (outlined in orange) that had been placed in the memorial as well. One firearm appears to be gray and the other appears to be tan. A still image from that video follows:



259. MARQUEZ was not a full member of the Trinitarios and had not yet been blessed into the gang. Nevertheless, multiple cooperating witnesses (including CW-12 and CW-16) informed us that members and leaders of the Lynn Chapter attended MARQUEZ's funeral, including SANTOS. At the funeral, according to cooperating witnesses, SANTOS posthumously awarded MARQUEZ his Trinitario "beads", formally initiating him into the gang as a member after his death. SANTOS placed the beads on MARQUEZ's body while it was in the casket. These

beads were then placed on the fence at the memorial after they had been awarded. A photograph from the funeral showing MARQUEZ's body with the beads having been posthumously awarded and placed on his body follows. The caption of the photograph translates to: "Fly high warrior, may God have you in glory."



N. 8/22/2023, PAULA-CABRAL AUTHORIZED RETALIATION FOR THE MURDER OF MARQUEZ

260. Multiple cooperating witnesses (CW-12, CW-16, CW-25) have confirmed that PAULA-CABRAL specifically authorized retaliation against rival gangs in response to MARQUEZ's murder. Multiple cooperating witnesses described the green light being authorized by PAULA-CABRAL over the Trinitarios group chat on the Signal Application.

261. In addition to the messages being sent to the group chat, this authorization to retaliate was captured in text messages and audio messages sent on August 22, 2023, by PAULA-CABRAL to TOMY SANCHEZ, who was then the #3 for the Lynn Chapter. These audio and text messages were recovered by investigators.

262. In the conversation, PAULA-CABRAL specifically states that he has “sent the crew to the street to destroy”, meaning retaliate for the attack on MARQUEZ. Then, once MARQUEZ is confirmed to have died, PAULA-CABRAL states that the Trinitarios must make a “show” of their “strength” against the rivals and that he is going to “take the dogs for a walk”, meaning retaliate for the murder. SANCHEZ states that the Trinitarios have suffered recent losses with the death of “Brian” (see the 4/10/22 murder described above) and another Trinitario, and they must even the score. PAULA-CABRAL agrees and then cautions SANCHEZ against talking further over the phone and indicates they will meet in person. The pertinent messages from the conversation follow, with a preliminary translation conducted of the content into English.

AUTHOR / DATE - TIME	PRELIMINARY TRANSLATION
SANCHEZ 8/22/2023 7:35:35 PM(UTC-4)	Is it true, my brother that Travieso got stabbed? Why is it that this kid keeps getting stabbed? That kid has gotten a couple of ugly stabs.
PAULA-CABRAL 8/22/2023 7:41:00 PM(UTC-4)	Yes, my brother I sent the crew to the streets to destroy. (“Siii manito yo mandé a los tigre pa la calle a rompe”)
PAULA-CABRAL 8/22/2023 9:32:56 PM(UTC-4)	Bro travieso was removed ("Bro quitaron a travieso")
SANCHEZ 8/22/2023 10:29:45 PM(UTC-4)	Oh my god
PAULA-CABRAL 8/22/2023 10:39:31 PM(UTC-4)	Oh my brother, I am so pissed. You have no idea how I feel.
SANCHEZ 8/22/2023 10:40:10 PM(UTC-4)	No, my brother. I also feel really bad. But one thing, my brother was Travieso the target or Trucho's brother (U/I)?
PAULA-CABRAL 8/22/2023 10:41:18 PM(UTC-4)	He was the target. Damn brother.
SANCHEZ 8/22/2023 11:38:59 PM(UTC-4)	Damn brother. Truly what a mess. There are problems, brother.
PAULA-CABRAL 8/22/2023 11:40:26 PM(UTC-4)	No, my brother. Let me take the dogs out for a walk. Let's show our strength now let's hit it.
SANCHEZ 8/23/2023 1:18:13 AM(UTC-4)	Damn, my brother. I'm going to tell you truth you know that Beneke (ph) was there. Beneke (ph) was always a dude that

	was willing. He would come to me always willing to do anything. Damn but because he was alone? Valor and truth, my brother, truly.
PAULA-CABRAL 8/23/2023 1:18:42 AM(UTC-4)	That's what hurts me my brother ("Eso es lo que me duele manito")
SANCHEZ 8/23/2023 1:19:09 AM(UTC-4)	little brother and also me because that little kid was always, ya know? Damn bro. They took Brian and then they took Beneke. Let's even up the game.
PAULA-CABRAL 8/23/2023 6:06:25 AM(UTC-4)	When you come down, we'll talk in person, my brother. ("Cuando tú bajes hablamos en persona Manito")
SANCHEZ 8/23/2023 4:37:39 PM(UTC-4)	Okay, my King ("Tt mi rey")

O. 8/27/2023, ATTEMPTED MURDER & CONSPIRACY TO MURDER

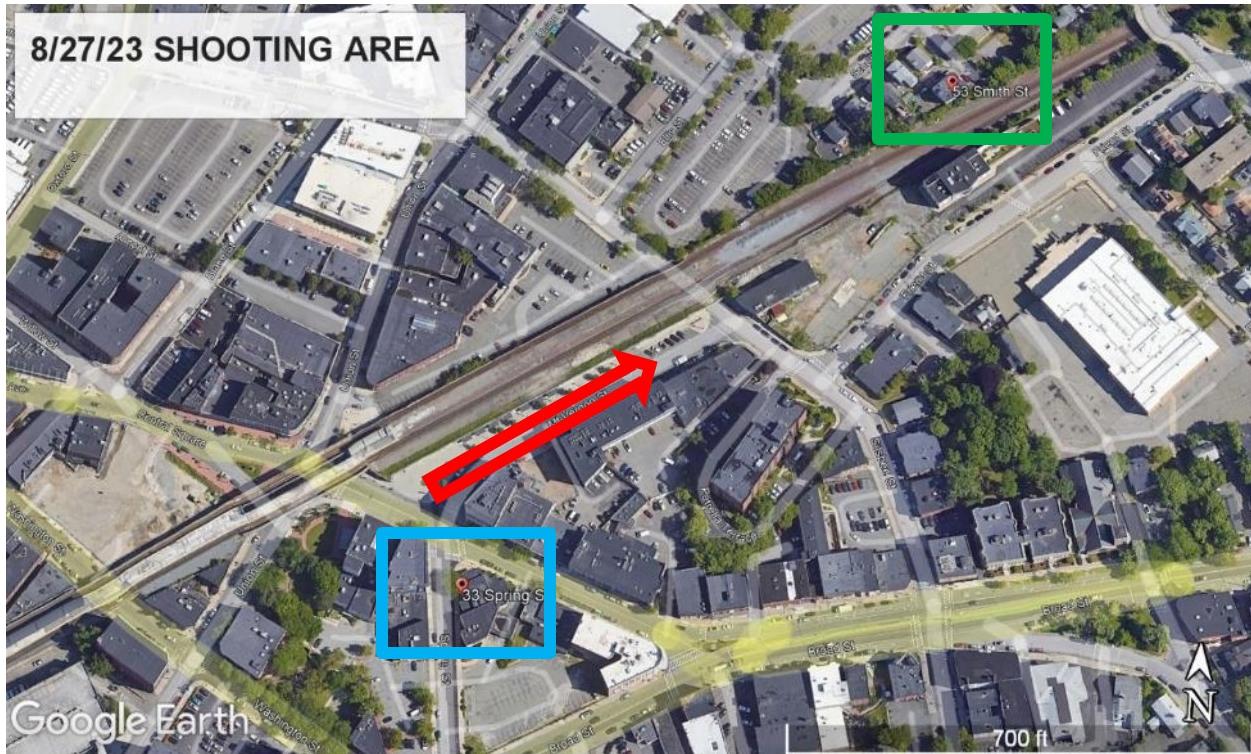
263. Investigators are familiar with the facts related to a shooting that took place in Lynn, MA on August 27, 2023, that was committed by Trinitario members. According to multiple cooperating witnesses, this shooting involved six members of the Lynn Chapter planning to commit a coordinated shooting of rival gang members, who were identified as being present at a party taking place at a studio in Lynn. The Trinitarios who went to commit the shooting included ANGEL SANTOS, MICHAEL MILIANO, JAMES JIMENEZ, JUSTIN ALBA, ISRAEL GARCIA VASQUEZ and DARWIN BATISTA. According to cooperating witnesses, SANTOS, MILIANO and ALBA located the rival gang members and fired rounds. After the shooting, a group of Trinitarios travelled to PAULA-CABRAL's residence to discuss the shooting and stash the firearms used in the shooting.

i. Initial Police Response

264. According to Lynn Police Report #23057397, on August 27, 2023, at approximately 2:23 AM, Lynn Police Department responded to Exchange Street and Spring Street, Lynn MA, for several reports of gunfire by multiple 911 callers. One of the 911 callers reported hearing multiple gunshots and that several had entered through her second story apartment. Upon arriving at the scene, police spoke with various witnesses.

265. One of the 911 callers directed officers to where a projectile had entered through a kitchen window and struck the opposite wall, and at least two projectiles entered through a bedroom and impacted the opposite wall and ceiling. Two other family members, including the caller's young daughter were also in the home at the time.

266. In addition to the witnesses at 33 Spring Street, police spoke with another 911 caller, located on Mount Vernon Street. This witness stated she heard the gunshots that prompted the 911 call. She informed officers that upon hearing the gunshots, she looked out her window, and observed at least three (3) individuals wearing black sweatshirts with hoods on, as well as sweatpants. She stated she observed at least one of the individuals to be black, and that all the individuals were approximately 5'8" and lanky with slim builds. In her statement she described the suspects running from Exchange Street, down Mount Vernon Street, and towards Silsbee Street. I know that this path is consistent with the most logical path from 33 Spring Street to 53 Smith Street and would entail going over the train tracks to travel back to 53 Smith Street. A map of the area follows with 33 Spring Street identified in blue, the path of flight reported in red, and the Trinitarios stronghold of 53 Smith Street outlined in green.



267. At 33 Spring Street, officers located multiple spent shell casings. Most of the casings were located on the sidewalk opposite 33 Spring Street and consisted of thirteen (13) .40 caliber and five (5) 9mm casings. Officers also observed several marks on the building that appeared to be projectile impacts on the building in the immediate vicinity outside of Mike P's Studio. In total, eighteen (18) shell casings were collected.

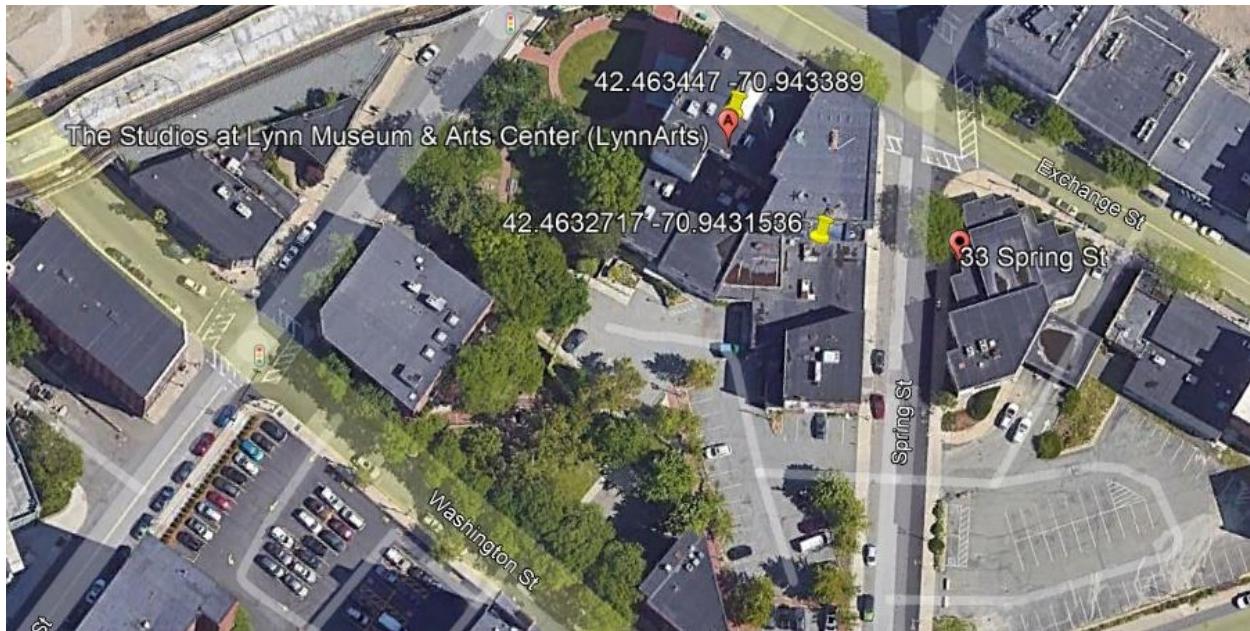
ii. Review of SANTOS' Phone

268. Investigators reviewed data obtained from SANTOS' cellular phone. In the data for SANTOS's phone, investigators located a search in the Apple Maps program for "33 Spring Street" with the longitude and latitude of 42.463271, -70.943154, at 1:06 AM on August 27, 2023. The address of 33 Spring Street is essentially next to the location of the shooting, and the longitude and latitude resolve to the same location as well. Investigators also located a search in the Waze navigational program for Lynn Arts Inc. at 1:13 AM on August 27, 2023. As noted, the shooting took place at 2:23 AM on August 27, 2023. The address of Lynn Arts, Inc. is 25 Exchange Street,

Lynn, MA. A few minutes later, SANTOS then navigated to the Lynn Arts Inc., which is located at 25 Exchange Street, Lynn, MA, near corner of Exchange Street and Spring Street, the location where the shooting was reported. Those entries from SANTOS' phone follow:

Date / Time	Entry	Application	Longitude	Latitude
8/27/2023 1:06:40 AM (UTC-4)	(42.463271, -70.943154) 33 Spring St	Apple Maps	42.4632717	-70.9431536
8/27/2023 1:13:12 AM (UTC-4)	Lynn Arts Inc	Waze	42.463447	-70.943389

269. A map showing the area of Exchange Street and Spring Street follows, with those locations identified from SANTOS's phone marked by pins and makers:



iii. Cooperating Witness Information

270. Multiple cooperating witnesses provided information about this shooting.

- a. CW-12 provided information about this shooting. CW-12 was with numerous Trinitarios at 53 Smith Street on August 27, 2023. The Trinitarios were aware of rival gang members who were having a party nearby through social media. They discussed shooting and killing rival gang members from TRG and Westside World who were at the party, in retaliation for the murder of Marquez. According to CW-12, two menores, including RAMIREZ were sent to be lookout and report as to whether the party was taking place and who was present. Once the menores provided information about rival gang members being present to the group at 53 Smith Street, six Trinitarios went to go commit the shooting. CW-12 observed SANTOS, MILIANO, DARWIN BATISTA,

GARCIA VASQUEZ, JIMENEZ, and ALBA leave the Trinitario house at 53 Smith Street with firearms and go commit the shooting. CW-12 heard the gunfire from 53 Smith Street. CW-12 learned that SANTOS, MILIANO and DARWIN BATISTA all fired rounds at rival gang members. CW-12 stated that after the shooting, the group returned to 53 Smith Street and the firearms were driven by RUIZ to PAULA-CABRAL's apartment on Keys Drive in Peabody, MA. SANTOS, DARWIN BATISTA, ALBA, GARCIA VASQUEZ and JIMENEZ all went to PAULA-CABRAL's apartment to discuss the shooting and conceal the firearm. While there, SANTOS and DARWIN BATISTA explained what happened. Specifically, SANTOS approached one of the TRG members in the parking lot of the studio and said "what's up." SANTOS then used a handgun with a selector switch to shoot six rounds at the TRG member, and his gun jammed. MILIANO and GARCIA VASQUEZ also fired their guns as well.

- b. CW-13 provided information on this shooting. CW-13 was at 53 Smith Street on August 27, 2023. CW-13 observed DARWIN BATISTA, GARCIA VASQUEZ, SANTOS, and ALBA leave to go shoot at rival gang members at a party located at a music studio. CW-13 observed that DARWIN BATISTA, GARCIA VASQUEZ, SANTOS, and ALBA all had firearms. Other Trinitarios may have also went to commit the shooting but CW-13 did not necessarily see them. CW-13 saw that SANTOS was in possession of a Glock with a selector switch. CW-13 heard the gunfire from the shooting and it sounded like a fully automatic weapon. A few days after the shooting, CW-13 brought the firearms to ALBA's house in Peabody. CW-13 provided the firearms to ALBA in a backpack.

- c. CW-19 provided information on this shooting. SANTOS and MILIANO told CW-19 that SANTOS, MILIANO and BATISTA committed a shooting at a music studio in Lynn. SANTOS and MILIANO told CW-19 that other Trinitarios were supposed to be involved in the shooting, but they did not make it to the location in time to participate.

iv. RUIZ GPS INFORMATION

271. As noted, a cooperating witness stated that after the shooting RUIZ brought the firearms to PAULA-CABRAL's residence at Keys Drive in Peabody, MA, and that other Trinitarios involved in the shooting went to PAULA-CABRAL's residence and discussed the shooting there with PAULA-CABRAL.

272. WARLY RUIZ was subject to a court-ordered GPS bracelet on August 27, 2023.

Review of the data from RUIZ's court-ordered bracelet shows the following:

- a. RUIZ travelled left 53 Smith Street at approximately 11:40 PM on August 26, 2023. RUIZ travelled to the area of 33 Spring Street at 11:47 PM. RUIZ then returned to the vicinity of 53 Smith Street at 12:03 AM on August 27, 2023.
- b. RUIZ remained in the vicinity of 53 Smith from August 27, 2023, at 12:05 AM through approximately 12:51 AM on August 27, 2023.
- c. RUIZ left 53 Smith Street at approximately 12:51 AM on August 27, 2023. RUIZ travelled to the area of 33 Spring Street at 1:01 AM. RUIZ then returned to the vicinity of 53 Smith Street at 1:12 AM on August 27, 2023.
- d. RUIZ remained at 53 Smith Street from 1:10 AM until approximately 2:58 AM. At approximately 3:00 AM, RUIZ travelled from 53 Smith Street to 38 Keys Drive, Peabody, MA, which is PAULA-CABRAL's residence. RUIZ arrived in the area of 38 Keys Drive, Peabody, MA, at 3:14 AM, and remained through until at least 4:42 AM.

P. 9/2/2023, DOUBLE MURDER, CONSPIRACY TO MURDER

273. I am familiar with the facts related to the September 2, 2023, double murder of Jandriel Heredia and Abraham Diaz in Lynn, MA, while at a farewell party for an individual heading off to college. Based upon information from multiple cooperating witnesses, I know that the Trinitarios are responsible for this shooting and targeted the party in retaliation for MARQUEZ's murder. The Trinitarios believed that rival gang members, including specifically a rival gang member named MA, were in attendance at the party. The Trinitarios utilized MARQUEZ's vehicle, a green Honda Accord, during the shooting in order to send a message to the rival gang. According to multiple cooperating witnesses, I know that JUSTIN ALBA and DARWIN BATISTA each fired weapons and ABEL SEVERINO REYES drove Marquez's vehicle during this shooting. Multiple cooperating witnesses also identified numerous other Trinitarios, including PAULA-CABRAL, ROMAN, MILIANO, VALLECILLO, SANCHEZ, and JIMENEZ, as participating in the double murder as well.

i. Initial Response and Scene

274. On September 2, 2023, at approximately 2:20 AM, Lynn Police responded to multiple 911 calls for shots fired in the area of 189 Essex Street in Lynn. Responding officers found that 7 people had been shot while outside at a party. Multiple shell casings were observed in the street, along with broken glass. Abraham Diaz and Jandriel Heredia were both shot and killed. Five other victims had been shot and ultimately survived.

275. Investigators interviewed several of the partygoers who claimed that the suspects fired from a vehicle and fled in that vehicle down Essex Street. Witnesses also stated that the vehicle took a right hand turn onto Chatham Street where it was last observed. One witness described the vehicle as being an older model dark colored Honda sedan.

276. Witnesses also reported that a member of LCG, who I have previously referred to as MA, was present at the party. At some point, according to a witness, the individual I have previously referred to as Victim 1 was at the party and on his phone yelling, "You know where I am, pull up and come get me." Investigators believe that this message sent by Victim 1 was transmitted over social media, heard by the Trinitarios and formed the basis for the Trinitarios' belief that Victim 1 and potentially other rival gang members were at the party on Essex Street.

ii. Surveillance Video of Murder Vehicle

277. Investigators located surveillance video that depicted the double-murder and the vehicle used in the incident. Through a review of various cameras, the vehicle used in the double murder was identified to be a green Honda Accord.

278. Surveillance video from 189 Essex Street depicted the green Honda Accord slow down in front of the party, and muzzle flashes emanating from the front and rear passenger-side windows. Based on the video, it appeared that one suspect fired from the front passenger seat and the other from the rear seat. Crime scene personnel located shell casings in two different calibers

in the street at the area where the gunfire was depicted. Crime scene personnel also located broken glass in the street that was consistent with where the green Honda Accord was located during the gunfire. It appeared that the suspects had shot out part of the rear passenger side window. A series of still images follow that depict the green Honda Accord (outlined in blue) during the gunfire, with muzzle flashes visible.

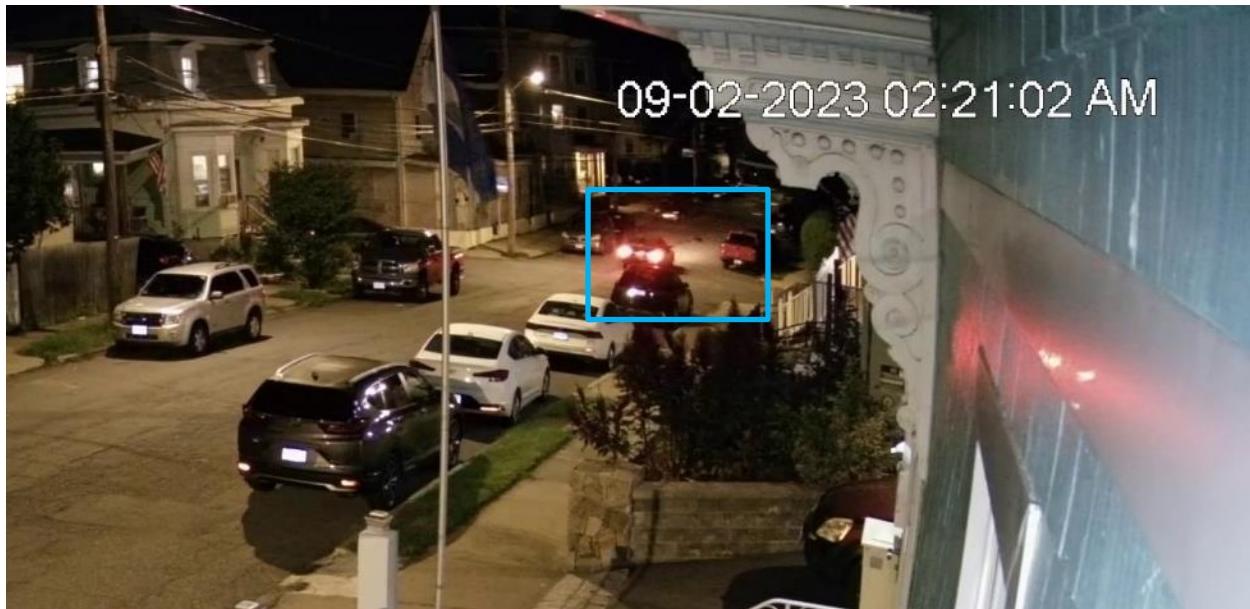


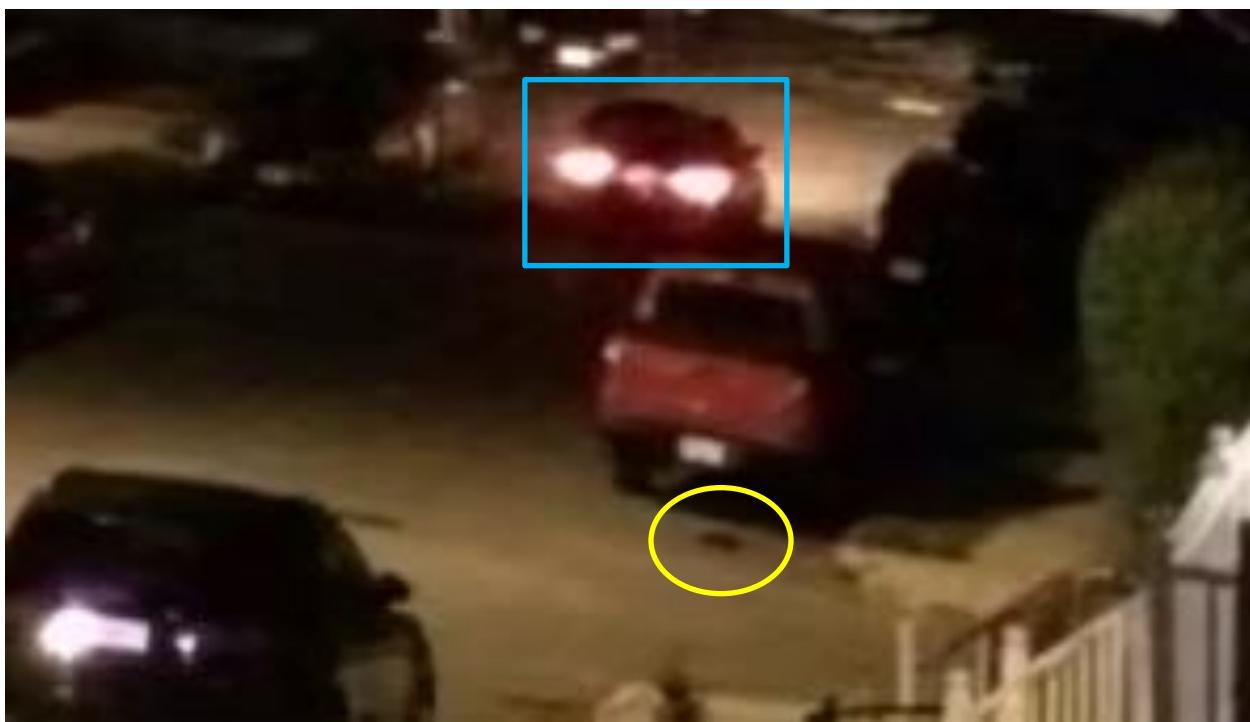


279. Investigators determined through review of various cameras in the area that the vehicle used in the shooting was a green Honda Accord with an attached license plate of Rhode Island Registration number 1MW300. Investigators learned this green Honda Accord had been purchased by Daniel Marquez from the previous owner on August 15, 2023, through Facebook

Marketplace, along with the attached Rhode Island 1MW300 license plate. This sale took place about a week before Marquez was murdered in Lynn, MA.

280. On Ingalls Street in Lynn, Massachusetts, investigators recovered surveillance video that depicts MARQUEZ's green Honda driving past at approximately 2:21 AM, and engaging the brakes. While slowed down, a hand extends out of the passenger side window and a black item is thrown to the ground. A series of still images from the video follow, with MARQUEZ's Honda outlined in blue, a zoomed-in version depicting the black item being thrown outlined in yellow, and a third image showing MARQUEZ's Honda driving off and the bag at rest behind the red truck. Based on my investigation, I know from a cooperating witness that ALBA threw the black item out of MARQUEZ's Honda, and the black item being thrown is in fact the black backpack containing the two firearms used in the double murder.





281. Seconds after the item is thrown from Marquez's green Honda, the video depicts two figures emerge from Collins Street and walk toward the black backpack that has come to a rest behind a red pickup truck. Those two figures stop and pick up the black backpack and bring it with them. A series of still images from the surveillance video follow depicting these two individuals walking up, stopping and picking up the black backpack, and taking it with them.



282. I know from multiple cooperating witnesses that one of the individuals depicted picking up the black backpack was LEONARDO ESPINOZA. I also know from multiple cooperating witnesses that the black backpack contained the firearms used in the double murder.

iii. Murder Vehicle Recovered in Lawrence, Massachusetts

283. On September 10, 2023, Lawrence Police located the green Honda Accord parked on Middlebury Street. The rear passenger side window was missing, and a trash bag was taped over the rear passenger side window expanse.

284. Investigators spoke with a witness who lives near where the vehicle was located. She reported that sometime within the previous week, she observed multiple young males exit the vehicle and “wipe it down.” She then observed the males enter another vehicle and leave the scene. Investigators were able to determine that the group appeared to wipe down the green Honda at approximately 5:30 AM on September 2, 2023, approximately three hours after the double murder.

285. Investigators also reviewed surveillance video from the area showing multiple individuals returning to the green Honda at approximately 9:30 AM on September 2, 2023, and moving the car. Officers learned that the green Honda Accord had a license plate bearing 3FCJ74 attached to it when it was abandoned. The recovered license plate, 3FCJ74, was determined to be registered to a 2019 white Honda CRV that was in the possession of WARLY RUIZ.

286. A search was conducted of Marquez's green Honda that was recovered in Lawrence. Multiple spent shell casings were recovered from inside of the vehicle. The vehicle's interior also tested positive for the presence of gunshot residue, indicating that a gun had been fired from within the vehicle. It was also confirmed that the black plastic covering the vehicle's broken rear passenger door window was consistent with the black plastic trash bags that investigators would later learn had been purchased at the Methuen Walmart.

287. The green Honda was also processed for fingerprint evidence. One fingerprint recovered from the black plastic that was covering the broken window was individualized to LEONARDO ESPINOZA. A second fingerprint recovered from the black plastic was individualized to CARLOS RAMIREZ.

iv. RUIZ GPS and SURVEILLANCE VIDEO

288. Investigators learned that, as a condition of his probation, WARLY RUIZ was required to wear a GPS monitoring ankle bracelet. Records related to RUIZ's ankle bracelet were then obtained from the State Probation Department's electronic monitoring program. The GPS records showed that on September 2, 2023, RUIZ passed by 189 Essex Street at least four separate times prior to the shooting. The last pass was at approximately 2:02 AM on September 2, 2023, which was twenty minutes before the shooting. RUIZ's location data for the time of the murder, however, ruled out RUIZ as being one of the shooters.

289. The video surveillance of the green Honda Accord from the area showed that the path of travel of the green Honda in the minutes after the shooting was the same as the GPS records for RUIZ's bracelet in the minutes after the shooting. The GPS records also showed that RUIZ traveled to Lawrence on September 2, 2023, and was in the area of Middlebury Street, which was the location where Marquez's green Honda was later recovered.

290. A review of the collected video evidence and RUIZ's GPS records for September 1, 2023, revealed the following:

- a. At approximately 8:30 PM, RUIZ's GPS points place him in the area of 53 Smith Street in Lynn.
- b. At approximately 9:58 PM, RUIZ's GPS points place him in the area of Quarry Lane, in Malden, MA, which is where Marquez lived.
- c. At approximately 10:20 PM, RUIZ's GPS points place him in the area of 21 Sutton Street in Peabody. In September 2023, JUSTIN ALBA, A/K/A "TUTO", the "Disciplina" for the Lynn Chapter was known to be residing at 21 Sutton Street in Peabody.

291. Review of the GPS data also shows that RUIZ was in the area of Lake View Road at approximately 2:20 AM on September 2, 2023. At approximately 2:27 AM on September 2, 2023, RUIZ began travelling from the area of Lake View Road in Lynn, MA to Lawrence, MA. Based on information from multiple cooperating witnesses described below, I know that SEVERINO REYES, DARWIN BATISTA and ALBA were in RUIZ's car at that time and RUIZ left Lake View Road and that RUIZ drove them to Lawrence.

292. A review of the collected video evidence and RUIZ's GPS records for September 2, 2023, revealed the following:

- a. At 2:05 AM (approximately fifteen minutes before the shooting), RUIZ's red Jeep was captured on a Lynn, MA camera on Lynn Shore Drive and his GPS records placed him at that location at that time.
- b. At 2:23 AM to 2:26 AM, RUIZ's GPS records placed him in the vicinity of Lake View Avenue in Lynn, MA. RUIZ's GPS records also showed him to be in the vicinity of Lake View Avenue from 4:54 AM to 4:55 AM.
- c. At 3:07 AM hours, RUIZ's red Jeep was captured on a Lawrence, MA camera on Broadway and his GPS records placed him at that location at that time.
- d. On two separate instances on September 2, 2023, RUIZ's GPS points were at 13 Gill Avenue in Methuen. The first was from 3:18 AM to 3:20 AM hours, and the second was from 9:33 AM to 9:39 AM. The address of 13 Gill Avenue, Methuen, MA, is known to be GARCIA VASQUEZ's residence.

- e. Between 3:07 AM and 3:13 AM, video evidence showed a red Jeep consistent with RUIZ's Jeep was at the Speedway Gas Station on Broadway in Lawrence. RUIZ's GPS records placed him at the Speedway at that time. RUIZ was captured on video surveillance entering the Speedway and making a purchase.
- f. At 3:24 AM, RUIZ's Jeep was captured on a Lawrence, MA camera on Haverhill Street and his GPS records placed him at that location at that time.
- g. From approximately 4:42 AM to 4:53 AM, RUIZ's GPS records place him in the vicinity of Lake View Avenue.
- h. From approximately 5:45 AM to 6:11 AM, RUIZ's GPS records place him in the area of Methuen Street in Lawrence, MA. Surveillance video from the area shows: (1) a black Honda with streaks on the hood; (2) a white BMW SUV; and (3) a newer model dark colored Honda. Surveillance video recovered from this area depicts the three vehicles parking and the occupants congregating and talking outside of the vehicles. Still images follow depicting the three vehicles pulling onto Methuen Street (in sequence of the black Honda with streaks on the hood, LUIS ENRIQUE SANTANA's white BMW, and JIMENEZ's newer Honda) and the three vehicles parked.





- i. I know from cooperating witnesses that: LUIS ENRIQUE SANTANA and WARLY RUIZ were within the white BMW SUV; a Trinitario associate is in the black Honda, with ALBA, SEVERINO REYES, and DARWIN BATISTA; JAMES JIMENEZ was operating the newer model Honda with TOMY SANCHEZ and other Trinitarios inside.
- j. At approximately 8:30 AM, approximately six hours after the shooting, RUIZ's GPS points also showed that he was near the Walmart in Methuen. Video evidence was obtained from Walmart. At the time that RUIZ's GPS records placed him in the area of the Walmart, a red Jeep consistent with the one owned by RUIZ is observed pulling into the store's parking lot. Two passengers are then observed exiting the vehicle and entering the store. The

store video then shows the two passengers shopping and buying items. One of the passengers paid cash for items at a self-check-out register. A duplicate receipt provided by the store showed that the two individuals bought Clorox wipes and Hefty brand 39-gallon trash bags. The video evidence showed that the trash bags were black. The time of the purchase was 8:39 AM on September 2, 2023. The video then shows the two passengers returning to the Jeep, which then drives out of the parking lot. These two individuals were identified to be CARLOS RAMIREZ and LEONARDO ESPINOZA. Still images from the Walmart follow:



- k. At 8:55 AM, video evidence showed a red Jeep consistent with RUIZ's in the area of Byron Avenue and Middlebury Street where the suspect vehicle was later located, and RUIZ's GPS records showed him to be at that same location at that same time.
 - l. From approximately 11:00 AM to 11:50 AM, RUIZ's GPS points place him in the area of the Lynn Woods Reservation in Lynn.
293. LEONARDO ESPINOZA's residence on Collins Street in Lynn was searched and clothing worn by ESPINOZA during the Walmart purchase in Methuen was recovered.

294. RUIZ was arrested on a warrant charging him with being an accessory after the fact to murder. As part of the investigation RUIZ's home was searched. Included amongst the items

seized during the search warrant was a Massachusetts license plate bearing 3FCJ74, which was the same license plate number that was attached to Marquez's green Honda in Lawrence.

v. RUIZ's Cellular phone

295. Investigators reviewed data from RUIZ's cellular phone and located data and call logs for third party apps such as Telegram, WhatsApp, and Signal. Among the data for these applications, investigators observed a 3 minute and 58 second incoming call from PAULA-CABRAL at 2:35 AM on September 2, 2023, to RUIZ. This call was received by RUIZ approximately fifteen minutes after the double murder, at a time when RUIZ had already picked up ALBA, DARWIN BATISTA and REYES and was then travelling to GARCIA VASQUEZ's residence in Methuen, MA.

296. During the review of RUIZ's cellular phone, investigators located a group chat on the Signal application. The group chat had been created on September 1, 2023, at 12:07 AM, which is about 26 hours prior to the double murder. The content was not available, but the participants and entries showing past messages having been sent by certain participants were retained.

297. Among the participants in the Signal group chat were the following individuals, who have been identified by multiple cooperating witnesses, and review of other phone data:

Phone Number	Contact Name	True Name
xxx-xxx-2896	Youngls Ls	LUIS ENRIQUE SANTANA
xxx-xxx-7713	Goldo	PAULA-CABRAL
xxx-xxx-5087	Jordani H	ERY JORDANI
xxx-xxx-2099	James Pelotero	JAMES JIMENEZ
xxx-xxx-6463	Whoop7y	KEVIN LIRANZO RAMON
xxx-xxx-5981	Sosadpl	AARON DIAZ LIRANZO
xxx-xxx-6827	ElTuto	JUSTIN ALBA
xxx-xxx-9563	Sopitaax157	LUIS JEFFREY SANTANA
xxx-xxx-4522	El Py	DARWIN BATISTA
xxx-xxx-0312	El viejo K	JANOY BATISTA

298. The Signal Chat reflects numerous messages being sent by various members during times pertinent to the meetings, planning, reconnaissance, and concealment after the double murder on September 2, 2023. Among those participating in the chat during the period from 10:00 PM on September 1, 2023, through the time of the double murder and afterward, are ALBA, DARWIN BATISTA, ROMAN, JORDANI, JIMENEZ, PAULA-CABRAL, LUIS JEFFREY SANTANA, LUIS ENRIQUE SANTANA,

vi. Cooperating Witnesses

299. Multiple cooperating witnesses provided information to investigators regarding the September 2, 2023, double murder. Based on the information provided by at least five cooperating witnesses (including CW-12, CW-13, CW-16, CW-19, CW-25), whose information is in general agreement, I am aware of the following sequence of events taking place on the evening of September 1, 2023, through the morning of September 2, 2023:

- a. The Trinitarios committed this shooting in retaliation for the murder of Daniel Marquez and used Marquez's vehicle for the shooting in order to send a message to the rival gangs. PAULA-CABRAL authorized a "green light" or retaliation by the Trinitarios for the death of Marquez. There were multiple meetings where the Trinitarios discussed the retaliatory shooting. These meetings took place at the parking lot by a beach on Lynn Shore Drive in Lynn, on September 1, 2023, and September 2, 2023. During the course of that evening, the Trinitarios also discussed the plan in person and provided updates to each other over a group chat on the Signal application.
- b. The Trinitarios present for the initial meeting where the plans to retaliate were discussed were WARLY RUIZ, DARWIN BATISTA, ESPINOZA, RAMIREZ, VALLECILLO and ROMAN. After this meeting, RUIZ, DARWIN BATISTA, VALLECILLO and ROMAN went to Marquez's house to get Marquez's green Honda Accord. VALLECILLO and ROMAN drove Marquez's green Honda Accord back to the beach parking lot. RUIZ and DARWIN BATISTA drove to ALBA's residence on Sutton Street in Peabody, MA, to pick up ALBA and then went to the beach parking lot. When they picked up ALBA, he brought two firearms with him. At least one of these guns belonged to GARCIA VASQUEZ.
- c. When the group arrived back at the beach parking lot, a second meeting took place where the shooting was discussed. By this time, additional Trinitarios

had arrived at the beach parking lot. Present for this second meeting were RUIZ, ALBA, JIMENEZ, SANCHEZ, DARWIN BATISTA, ABEL SEVERINO REYES, VALLECILLO, ROMAN, MILIANO and other members.

- d. After this meeting, at least three vehicles went out to look for the rival gang members at locations where the Trinitarios knew them to congregate. The following Trinitarios drove vehicles: (1) JIMENEZ, (2) RUIZ, and (3) MILIANO. SANCHEZ was one of the Trinitarios that was in the vehicle JIMENEZ was driving. RAMIREZ was in the vehicle MILIANO was driving.
- e. The Trinitarios located the party at 189 Essex Street where they believed the rival gang members were present. The vehicles sent out by the Trinitarios drove by 189 Essex Street multiple times.
- f. After locating the party, some of the Trinitarios reconvened back at the parking lot by the beach. There, a further meeting then took place at the beach parking lot where the plan for the shooting was discussed and agreed-upon. Among those present for this meeting were REYES, RUIZ, DARWIN BATISTA, ALBA, and VALLECILLO.
- g. The Trinitarios agreed upon a plan where REYES would drive Marquez's green Honda Accord, and ALBA and DARWIN BATISTA would fire at the party. They would then drop the guns at a location where the menores would pick up the guns and take them to a house nearby. RUIZ would meet REYES, ALBA, and DARWIN BATISTA at a location near the lake, where they would abandon Marquez's green Honda and RUIZ would drive them to Lawrence.
- h. After the plan was formed, REYES drove DARWIN BATISTA and ALBA to 189 Essex Street in Marquez's green Honda. ALBA sat in the front passenger seat and DARWIN BATISTA sat in the rear passenger seat. ALBA and DARWIN BATISTA had firearms. RUIZ drove to the meeting spot by the lake.
- i. With the party on the passenger side, ALBA and DARWIN BATISTA opened fire simultaneously. After they fired their rounds, the green Honda Accord drove to a predetermined location to drop the guns. As they drove, DARWIN BATISTA passed his gun to ALBA who placed the two firearms into a black backpack. When they reached Ingalls Street, the vehicle slowed down and ALBA threw the black backpack out the window. Moments later, ESPINOZA and another juvenile associate walked to pick up the black backpack and brought it to an associate's house.
- j. REYES, ALBA and DARWIN BATISTA parked Marquez's green Honda at a predetermined location near the lake and got into RUIZ's vehicle. RUIZ then drove them to ISRAEL GARCIA VASQUEZ's residence at Gill Avenue, in Methuen, MA.

- k. RUIZ then travelled back to Lynn. ENRIQUE SANTANA met with RUIZ and took him in a white BMW to pick up VALLECILLO. They then drove to where Marquez's green Honda was located by the lake and dropped off VALLECILLO. VALLECILLO drove the green Honda to Lawrence. SANCHEZ, and JIMENEZ, and other Trinitarios then arrived in another vehicle. The three vehicles (the white BMW, Marquez's green Honda, and JIMENEZ's vehicle) proceeded to Lawrence, with ENRIQUE SANTANA's white BMW in front, followed by Marquez's green Honda being driven by VALLECILLO, and then JIMENEZ's car with SANCHEZ.
 - l. VALLECILLO parked the green Honda on a street in Lawrence. ENRIQUE SANTANA, RUIZ and VALLECILLO then drove to ENRIQUE SANTANA's residence in Lawrence. While there, they met REYES, DARWIN BATISTA and ALBA with a Trinitario associate in the associate's car. That associate drove REYES, DARWIN BATISTA and ALBA to ROMAN's residence. JIMENEZ and SANCHEZ also drove to ENRIQUE SANTANA's residence in Lawrence. VALLECILLO and RUIZ got into the car with JIMENEZ and SANCHEZ and other Trinitarios and drove VALLECILLO and RUIZ to RUIZ's house.
 - m. RUIZ and VALLECILLO then drove in RUIZ's car to pick up ESPINOZA and RAMIREZ. RUIZ then drove VALLECILLO, ESPINOZA and RAMIREZ to Walmart, where ESPINOZA and RAMIREZ went inside and bought cleaning supplies. RUIZ then drove the group to where they had parked Marquez's green Honda. They cleaned the vehicle and put a trash bag over the broken window. They also switched the license plate for one that was associated with a vehicle owned by RUIZ.
 - n. Once the car was cleaned of evidence, RUIZ drove VALLECILLO, ESPINOZA and RAMIREZ to the associate's house where the guns had been placed. ESPINOZA and RAMIREZ got the guns and got back into RUIZ's car. RUIZ then drove the group to a wooded area in Lynn, where they buried the guns.

vii. GARCIA VASQUEZ Text Messages

300. Investigators located a series of audio messages sent by GARCIA VASQUEZ (under the contact name "Menolfinesse") to SANTOS on the morning of September 2, 2023, a few hours after the double murder. In the audio messages that have been roughly translated below, GARCIA VASQUEZ acknowledges the Trinitarios are at war with rival gangs, but complains to SANTOS that his firearms were used in the shooting without his permission ("we're at war little

brother...(UI)... war, but ask for permission if you want to use a steel"). As noted above, multiple witnesses reported that ALBA brought the firearms that were used in the shooting. Indeed, it appears that the firearms used in the September 2, 2023, shooting were the same firearms used in the August 27, 2023, shooting, that were then brought to PAULA-CABRAL's house, and then brought to ALBA's house.

301. GARCIA VASQUEZ goes on to complain about ALBA and claims that using the firearms in the shooting was disrespectful ("that "tiguere" disrespected me, little brother, for his entire life, little brother, take it from me, that's how I feel bro"). GARCIA VASQUEZ emphasizes that the Trinitario code ("our code") has respect as the third rule and that ALBA violated that code by using his firearms ("from the principles of our code is respect, little brother. Number 3, little brother. I would imagine that everyone would know that, little brother, you heard? Respect, little brother. And if you don't respect something of a little brother... you're not using that code").

302. GARCIA VASQUEZ then tells SANTOS he is going to tell PAULA-CABRAL that SANTOS will be the one who imposes any discipline on GARCIA VASQUEZ, not ALBA who holds the position of disciplina ("? I'm going to tell Gordo just like that, "Gordo, that's not my discipline, little brother. My discipline is Biggie, when Biggie...UI...when the discipline is for me, you put Biggie for me. I don't want to know about that man. And if he hits me hard with that "tabla" I'm going to fill up with hate for him. I'm going to talk to him, take it from me, Biggie, I don't want that "tiguere" disciplining me.").

AUTHOR	CONTENT	DATE
GARCIA VASQUEZ	Are you crazy? If I get into "dique" a gang "dique" for them to be doing "palomeria" to me, little brother, I am going to be far from the "tigueres" little brother. Are you crazy? "Tato," we're at war little brother...(UI)...war, but ask for permission if you want to use a steel, little brother...You all didn't give not even one for the steels, none, little brother, to have a "frecura" like that.	9/2/2023 7:55:44 AM (UTC-4)
GARCIA VASQUEZ	...UI...that group, saying everything around there, little brother, because of the "frecura" of the "tigueres," little brother. A damn "frecura," Biggie. Take it from me, bro, take it from me. You think I'm going to feel good, little brother?	9/2/2023 7:56:31 AM (UTC-4)

	"Dique"...UI...what little brother of mine, of what? You all aren't little brothers of mine, nah, little brother. When they come to me with that system, "dique," little brother, little brother. I'm going to take that out of my head. "Dique" what, little brother of mine, what little brother of the devil?	
GARCIA VASQUEZ	Little brother, that "tiguere" disrespected me, little brother, for his entire life, little brother, take it from me, that's how I feel bro, like disrespect for all the life, with that "frecura," little brother.	9/2/2023 7:58:25 AM (UTC-4)
GARCIA VASQUEZ	Matter of fact, that "tiguere" is a rookie little brother, that "tiguere" isn't even worthy of me telling him anything little brother. I'm going to erase all the messages I sent to him...and I'm going to give him a block, little brother. We'll talk in person, the same since little.	9/2/2023 7:59:11 AM (UTC-4)
GARCIA VASQUEZ	Little brother, from the principles of our code is respect, little brother. Number 3, little brother. I would imagine that everyone would know that, little brother, you heard? Respect, little brother. And if you don't respect something of a little brother,...UI...you're not using that code, little brother, what you're doing is violating it, little brother. You're not respecting, little brother. Or what is respect then, little brother? You'll see, when a meeting is made, and there is talking,...UI...I'm going to tell everything to everyone, little brother. Because none of them are running like they need to run, little brother, are you crazy?...UI...Are you crazy? I have the urge to slam myself, "loco," and land killed.	9/2/2023 8:03:25 PM (UTC-4)
GARCIA VASQUEZ	Are you crazy? I'm going to tell Gordo just like that, "Gordo, that's not my discipline, little brother. My discipline is Biggie, when Biggie...UI...when the discipline is for me, you put Biggie for me. I don't want to know about that man. And if he hits me hard with that "tabla" I'm going to fill up with hate for him. I'm going to talk to him, take it from me, Biggie, I don't want that "tiguere" disciplining me. Are you crazy? What discipline is that? Using "dique" the "frecura" of the "tigueres."	9/2/2023 8:03:26 PM (UTC-4)

viii. MILIANO Text Messages

303. Investigators reviewed a conversation that is believed to be between MILIANO utilizing the Instagram account (username: el_domiii53) and an unknown rival gang member (FNU) (username: ahahahshhshesh) taking place from January 2024, through March 2024. During the conversation, they exchange threats, discuss the violent acts that their gangs are responsible for committing, and insult one another and their respective gangs. During one part of the exchange in February 2024, FNU indicates that he “seen somebody get stabbed in a store lol” and that he saw the video on Telemundo, which is a reference to the murder of Daniel Marquez that was widely publicized. In response, MILIANO states “you didn’t look what happened next 😞 😞”

with two sad face emojis, believed to represent the two murder victims from September 2, 2023. FNU then responds, “oh 3 innocent” indicating that the victims were not gang members and MILIANO responds that someone had to accompany him, referring to accompany Marquez, following by crying and laughing emojis (“someone had to accompany him 😢🤣”). A portion of that conversation follows:

AUTHOR	CONTENT
MILIANO	the wsw are pussies
MILIANO	literally
FNU	😢😢
FNU	but you did nothing to a crip or gd
MILIANO	It was an idiotic question because if you were the ones who did that on my block, you are also faggots because since you saw me you ran.
MILIANO	And if it wasn't you, shut up, faggot, because then you haven't done anything in your life.
MILIANO	😢🤣
FNU	ask the trg about what we did they bitch just like you
MILIANO	What am I going to ask those pussies 🤣🤣🤣 they are pussies I don't have to ask it's confirmed 😢🤣 I'm not sending you to ask anyone anything I'm just telling you to watch Telemundo New England 🤣🤣🤣🤣🤣🤣🤣
FNU	yea i seen somebody get stabbed in a store lol
FNU	on telemuno
MILIANO	and you didn't look what happened next 😢😢
MILIANO	🤣🤣🤣
FNU	oh 3 innocent 🤪
MILIANO	someone had to accompany him 😢🤣

Q. 11/13/2023, ATTEMPTED MURDER, CONSPIRACY TO MURDER

304. Investigators are familiar with the facts related to an attempted murder that took place in Salem, MA on November 13, 2023. According to a cooperating witness, this attempted murder was arranged by JANOVY BATISTA. The victim was targeted because of his connection to a drug cartel that believed the victim had stolen drugs from them. According to a cooperating witness, the cartel reached out to JANOVY BATISTA and instructed JANOVY BATISTA to murder the victim in order to continue to receive drugs from the cartel.

i. Police Response

305. According to Salem Police Department report #2300036309, at approximately 7:50 AM on November 13, 2024, officers responded to reports of a gunshot victim at 23 Horton Street, Salem, MA. The victim was transported by his wife to the hospital for gunshot wounds in his left shoulder and hand.

306. In a statement to police prior to being transported to the hospital, the victim explained that he was heading to the gym when two masked individuals ran to the rear of his driveway and fired multiple rounds into the side of the vehicle he was sitting in. The victim further explained that he observed the two masked shooters depart in a white Honda CRV.

307. At the scene of the shooting near 23 Horton Street, officers spoke with another witness who stated that she observed a white Honda CRV at approximately 5:45 AM parked along the street.

308. Officers recovered numerous 9mm shell casings that were located across the driveway and street in front of 23 Horton Street. A bullet slug was located in the driveway and also inside the siding of the residence. There was a trail of blood leading around one of the vehicles that was still parked in the driveway that led to the back stairs of the house. The blood trail led up the back stairs on the deck and into the kitchen of the house.

ii. Surveillance Video & Further Investigation

309. A surveillance camera from 23 Horton Street captures the white Honda in the distance and the victim entering the vehicle. Shortly after the victim enters the driver's seat, the white Honda pulls up to the driveway of 23 Horton Street and stops, and two masked gunmen get out. The gunmen point firearms at the victim's vehicle and begin firing. Bullet holes can be observed in the windows from the penetration of the projectiles. The camera also captures audio

of the gunfire. After the gunmen appear to empty their weapons, they enter the white Honda CRV and drive out of view.



310. Investigators used local cameras to identify the white Honda CRV and its path of travel. Those cameras identified the white Honda CRV to have a Massachusetts license plate 3FCJ74 attached to it.²⁸ The white Honda CRV was captured on cameras heading northbound towards Salem on Chestnut Street at Mason Street in Lynn at approximately 5:13 AM and on Western Avenue at 5:17 AM. Still images follow:

²⁸ Of note, this is the same Mass. registration that was previously attached to Marquez's green Honda Accord on September 2, 2023. This Mass. registration was in fact registered to a white Honda CRV that was registered to an associate of WARLY RUIZ. At the time of the November 13, 2023, shooting, RUIZ was incarcerated in the Essex HOC.



311. The white Honda CRV was captured on a camera travelling on Western Avenue in Lynn at 7:58 AM, shortly after the shooting.



312. Officers continued to track the travel of the white Honda CRV through surveillance footage throughout the cities of Lynn and Salem.

313. Investigators obtained surveillance video from 104 Grant Street in Lynn.

- a. At approximately 8:03 AM, the white Honda CRV parks on Grant Street. Seconds later, a black Honda CRV pulls up and the three passengers from the white Honda CRV get into the black Honda CRV. The three passengers will be referred to as the two SHOOTERS and DRIVER.





- b. At 8:05 AM, the black Honda CRV then turns around and parks down Grant Street, and a rear passenger from the black Honda CRV (who was the driver of the white Honda CRV) gets out of the black Honda CRV and walks over to the white Honda CRV and opens the hood. The black Honda CRV backs into a driveway. After about a minute, the rear passenger walks back to the black Honda CRV carrying the battery for the white Honda CRV. The driver of the black Honda CRV is observed to be wearing a gray sweatshirt and is later identified to be JANOEY BATISTA.





314. Investigators obtained surveillance video from 111 Grant Street in Lynn that captured the same scene from a different angle.

- a. At approximately 8:03:09 AM, the white Honda CRV pulls up in front of 111 Grant Street, backs up and parks. At 8:04:26 AM, a black Honda CRV appears to drive by the white Honda CRV and park in front of 104 Grant Street. The occupant from the black Honda CRV exits the vehicle and runs over to the white CRV, opens the driver's door and is then observed opening the hood and removes the white CRV's battery. The occupant then walks back to the black Honda CRV carrying the battery from the white Honda CRV.



315. Upon viewing the video from 104 Grant Street, Detectives of the Lynn Police Department were able to determine the license plate of the black Honda CRV vehicle was 4SRN28.

A check through law enforcement databases showed the black Honda CRV to be registered to a rental company based in Lynn.

316. According to video recovered in the case, at approximately 8:09 AM on November 13, 2023, the black Honda CRV arrives and parks near Apartment #57A. This is approximately 4 minutes after the black Honda CRV was observed leaving the area of Grant Street at 8:05AM. The Memorial Park Ave housing project is approximately a 3-minute drive from 104 Grant Street. After it parks, an identified Trinitario member exits the front passenger seat of the black Honda CRV and then is observed at approximately 8:10 AM carrying a small black item in his hand and throwing the item away in a nearby dumpster. The item was consistent with a black ski mask. This known Trinitario then reenters the black Honda CRV.



317. At approximately 8:14 AM, JANOY BATISTA exits the black Honda CRV holding his cell phone in his right hand. JANOY BATISTA then walks out of frame to the left.



318. Approximately 30 seconds later, four individuals exit the black Honda CRV and walk out of view of the camera to the left.

- a. The known Trinitario who threw an item in the dumpster exits the front passenger seat of the black Honda CRV.
- b. The DRIVER of the white Honda CRV exits the rear driver-side seat of the black Honda CRV. The DRIVER of the white Honda CRV is wearing a flat brimmed baseball hat with a black hoodie with the hood up with a red shirt

hanging out of the bottom, black pants and black sneakers which is consistent with the DRIVER seen exiting the driver's seat of the white Honda CRV from the footage at 104 Grant Street and then retrieving the battery from the white Honda CRV.



- c. One of the SHOOTERS from Horton Street exits the rear driver-side seat of the black Honda CRV. This individual is wearing a gray hooded sweatshirt, dark pants and sneakers with white near the soles, which is consistent with the rear driver's side passenger that exited the white Honda CRV from the footage at 104 Grant Street and one of the shooters from the video on Horton Street. Images comparing this individual to the SHOOTER on Horton Street follow (noting the white writing on the sleeve):



- a. The second SHOOTER then exits the rear passenger-side seat of the black Honda CRV. This individual is wearing a black hooded sweatshirt with the hood up, carrying a black jacket with red going down along the zipper line with his left hand, while carrying a brown paper bag with his right hand. From this footage, white lettering can now be seen across the chest area on this individual's sweatshirt. This individual is further observed wearing black pants and black sneakers. This is consistent with the individual that exited the rear passenger side of the white Honda CRV from the footage at 104 Grant Street and one of the SHOOTERS from the video of the shooting on Horton Street. Images comparing this individual to the shooter on Horton Street (with the jacket zipped and red lining visible in the front) follow:



319. On November 14, 2023, at approximately 10:00 PM, investigators went to 53 Smith Street and observed the white Honda CRV from the shooting without front and back license plates.²⁹ The white Honda CRV was searched pursuant to a warrant and a black ski mask was found in the rear driver's side passenger area under the seat.

iii. Arrest of SANTOS Operating the Black Honda CRV

320. On November 20, 2023, Lynn Police arrested Angel SANTOS, A/K/A "BIGGIE" for driving without a license. SANTOS was operating the black Honda CRV bearing license plate

²⁹ The white Honda CRV located in the back driveway of 53 Smith Street was identified because it had similar characteristics to the white Honda CRV used in the attempted murder, specifically the vehicle did not have roof racks, it had a shark fin style antenna on the rear of the roof, had a black "Kelly" sticker affixed to the trunk of the vehicle below the "CRV" emblem, and also had tire rims consistent with those on the white CRV seen in the video of the shooting from 23 Horton Street in Salem.

4SRN28 at the time of his arrest. DAVID GARCIA A/K/A “BAMBINO” approached officers and requested to take custody of the vehicle, but was denied that request. At that time, the black Honda CRV was seized pending a search warrant.

321. On November 21, 2023, the owner of the black Honda CRV provided a recorded statement. The owner stated that he has numerous cars for people to rent. The owner stated that he has a GPS tracking device on a business account he has through Verizon Connect to track his rental cars. The owner stated that he rented the black Honda CRV to a known associate of SANTOS for approximately the last month.

322. The owner pulled up the tracking information on the Verizon Connect app that he had on his phone and he was able to allow investigators to photograph the vehicle’s movements on November 13, 2023.

323. Upon viewing the vehicle’s movements on the cell phone in his Verizon Connect app, investigators were able to determine that the black Honda CRV’s movements documented in the Verizon Connect app were consistent with multiple videos obtained over the course of this investigation. According to the owner’s application, the black Honda CRV traveled to Memorial Park Avenue, Lynn on November 13, 2023, at approximately 8:14 AM, consistent with the time when JANOVY BATISTA, the SHOOTERS and DRIVER arrived and walked past surveillance cameras at 57 Memorial Park.

iv. Cooperating Witness Testimony

324. Multiple cooperating witnesses provided information regarding the November 13, 2023, attempted murder.

- a. CW-12 told investigators that the victim of the shooting was working with JANOVY BATISTA and another individual selling drugs. According to CW-12, the victim owed JANOVY BATISTA and another drug conspirator money. The victim told JANOVY BATISTA that an amount of drugs he had received had been seized by the police and the victim owing money to JANOVY BATISTA

was the basis for the shooting. CW-12 knew that a vehicle owned by WARLY RUIZ was used in the shooting.

- b. CW-16 informed investigators that JANOVY BATISTA was involved in the November 2023 shooting. CW-16 heard that the shooting arose over a problem about drugs. Specifically, the victim of the shooting had stolen drugs from a large-scale drug supplier. CW-16 knew that JANOVY BATISTA wanted the Trinitarios to murder the victim. JANOVY BATISTA had asked GARCIA and DARWIN BATISTA to commit the murder of the victim in order to resolve the problem. Ultimately, CW-16 knew that the Trinitarios were not the shooters, but that JANOVY BATISTA had paid other individuals from Puerto Rico to kill the victim.
- c. CW-19 provided the following information regarding the November 2023, Salem shooting. According to CW-19, JANOVY BATISTA supplied the Trinitarios with kilograms of fentanyl and cocaine from a source of supply associated with a drug cartel. CW-19 learned from JANOVY BATISTA and SANTOS, that the victim of the shooting was part of the cartel's drug distribution network, and had stolen about 300 kilograms of drugs. JANOVY BATISTA spoke with the cartel who told JANOVY BATISTA that they wanted the victim killed and was willing to work with JANOVY BATISTA directly, but would only do so once the victim was killed. CW-19 learned that the shooting was not committed by Trinitarios. Rather, JANOVY BATISTA paid two assassins from Puerto Rico to kill the victim, but they were not successful. Multiple members of the Trinitarios and vehicles owned by the Trinitarios assisted in the commission of the attempted murder and concealment of evidence.

R. 11/16/2023, THREATS TO MURDER RIVAL GANG MEMBERS

325. I am familiar with a chat conversation between SANTOS and a rival gang member from the Gangster Disciples. In the conversation, SANTOS engages in a threatening back and forth conversation with a Gangster Disciple from Lawrence who I will refer to as FNU. During the conversation, SANTOS takes credit for multiple shootings, and identifies historical murders that the Trinitarios have committed in order to taunt the rival gang member.

326. During the conversation on November 16, 2023, SANTOS and FNU taunt one another. FNU initiates by calling SANTOS “soft” and asks why SANTOS did not retaliate (“Why you ain’t spin back”). SANTOS responds that no Trinitarios have been shot and asks who FNU is (“Nikka who u my ppl still untouched”). FNU invites SANTOS to his location on Swan Street

in Methuen (“Swan st methuen ma”) and suggests that they shoot at one another (“Pull up on feet and let’s the last one standing be the man ”). SANTOS provides a timetable, indicating that he will arrive in seven minutes. FNU claims that he is going to shoot up the whole car (“I’m flipping the whole whip”) and SANTOS replies that FNU better not miss (“Lmfaoo make sure u don’t miss”). SANTOS apparently drove by and was seen by FNU (“I see you passed by why u ain’t stopped ”), but SANTOS did not see him (“Lmfaoo I didn’t even see u clown”).

DATE – TIME	AUTHOR	CONTENT
11/16/2023 1:12:41 AM(UTC-5)	FNU-LNU	You soft
11/16/2023 1:13:03 AM(UTC-5)	FNU-LNU	
11/16/2023 1:13:21 AM(UTC-5)	FNU-LNU	Why you ain’t spin back
11/16/2023 1:30:30 AM(UTC-5)	FNU-LNU	 
11/16/2023 1:31:09 AM(UTC-5)	SANTOS	Nikka who u my ppl still untouched
11/16/2023 1:32:04 AM(UTC-5)	FNU-LNU	Don’t worry about it bloody you won’t say that when I catch you
11/16/2023 1:32:13 AM(UTC-5)	FNU-LNU	I’ll make sure of that
11/16/2023 1:32:35 AM(UTC-5)	FNU-LNU	Keep it cool
11/16/2023 1:32:45 AM(UTC-5)	SANTOS	Bet come katch me I’m outside withit make sure u don’t miss
11/16/2023 1:33:17 AM(UTC-5)	FNU-LNU	See that’s the energy I need from Niggas
11/16/2023 1:33:44 AM(UTC-5)	SANTOS	Bet snm
11/16/2023 1:33:53 AM(UTC-5)	FNU-LNU	Wya ?
11/16/2023 1:34:05 AM(UTC-5)	SANTOS	Outside wya
11/16/2023 1:34:12 AM(UTC-5)	SANTOS	Lets match
11/16/2023 1:34:17 AM(UTC-5)	SANTOS	
11/16/2023 1:34:23 AM(UTC-5)	FNU-LNU	I’m in Lawrence
11/16/2023 1:34:31 AM(UTC-5)	FNU-LNU	What we matching on ?
11/16/2023 1:34:45 AM(UTC-5)	SANTOS	Me too wtw
11/16/2023 1:34:51 AM(UTC-5)	SANTOS	Where u wanna link
11/16/2023 1:35:05 AM(UTC-5)	FNU-LNU	Swan st methuen ma
11/16/2023 1:35:15 AM(UTC-5)	SANTOS	Bet
11/16/2023 1:35:22 AM(UTC-5)	SANTOS	I’ll be there In 10
11/16/2023 1:35:40 AM(UTC-5)	FNU-LNU	What car ?
11/16/2023 1:35:48 AM(UTC-5)	FNU-LNU	I’m on feet nigga
11/16/2023 1:35:51 AM(UTC-5)	SANTOS	Don’t worry
11/16/2023 1:35:58 AM(UTC-5)	SANTOS	Just know ima be there
11/16/2023 1:36:21 AM(UTC-5)	FNU-LNU	Pull up on feet and let’s the last one standing be the man  
11/16/2023 1:36:58 AM(UTC-5)	SANTOS	You’re a clown 
11/16/2023 1:37:05 AM(UTC-5)	SANTOS	U gonna be there or what
11/16/2023 1:37:08 AM(UTC-5)	SANTOS	Don’t worry
11/16/2023 1:37:10 AM(UTC-5)	FNU-LNU	Nigga probably getting 25 niggas to spin on 1 nigga
11/16/2023 1:37:24 AM(UTC-5)	SANTOS	It’s just me and my driver
11/16/2023 1:37:27 AM(UTC-5)	SANTOS	U scared ?
11/16/2023 1:37:31 AM(UTC-5)	FNU-LNU	You a clown biggi

11/16/2023 1:37:39 AM(UTC-5)	FNU-LNU	Lol
11/16/2023 1:38:25 AM(UTC-5)	SANTOS	7min
11/16/2023 1:39:07 AM(UTC-5)	SANTOS	Exactly
11/16/2023 1:39:12 AM(UTC-5)	FNU-LNU	Dale que te toy esperando hoy te acabo esa movie de gangster que tu tiene
11/16/2023 1:39:36 AM(UTC-5)	SANTOS	Tu como que ta fustrado comigo
11/16/2023 1:39:50 AM(UTC-5)	SANTOS	Que gánster tu ere por mensaje 🤣
11/16/2023 1:40:12 AM(UTC-5)	FNU-LNU	Niggas think they low in the crv 🙄💯
11/16/2023 1:40:35 AM(UTC-5)	FNU-LNU	I'm flipping the whole whip
11/16/2023 1:41:01 AM(UTC-5)	SANTOS	Lmfaoo make sure u don't miss
11/16/2023 1:41:04 AM(UTC-5)	SANTOS	U ready
11/16/2023 1:41:11 AM(UTC-5)	SANTOS	4min
11/16/2023 1:41:30 AM(UTC-5)	FNU-LNU	Same spot on moms
11/16/2023 1:41:41 AM(UTC-5)	SANTOS	Bet
11/16/2023 1:46:09 AM(UTC-5)	FNU-LNU	I see you passed by why u ain't stopped 🤪
11/16/2023 1:46:33 AM(UTC-5)	SANTOS	Lmfaoo I didn't even see u clown
11/16/2023 1:47:06 AM(UTC-5)	FNU-LNU	Bend back
11/16/2023 1:47:24 AM(UTC-5)	FNU-LNU	And I promise you gone feel this
11/16/2023 1:47:37 AM(UTC-5)	FNU-LNU	I bet you don't pass back around
11/16/2023 1:48:37 AM(UTC-5)	FNU-LNU	You catching 30 on my momma
11/16/2023 1:51:20 AM(UTC-5)	FNU-LNU	Would you bang with me rn
11/16/2023 1:51:39 AM(UTC-5)	FNU-LNU	Im trynna get that with you

327. A few hours later, the conversation continues. SANTOS calls FNU soft and calls him out for not shooting despite seeing him (“u soft u saw me didn't even did shit”). SANTOS states that if he saw FNU he would have killed FNU (“if I did u wouldn't be here my son on gvng”). FNU and SANTOS then taunt each other over past murders committed by their rival gangs. FNU then states that SANTOS has poor grammar skills (“Shut up bitch nigga you can't even write the right way”). FNU references “Timmy”, but SANTOS is unfamiliar with that individual and asks FNU what gang he is with (“Yo what u bang pussy ass nikka”), and FNU responds that he is with the Gangster Disciple Nation (“GDN”). SANTOS then refers to the murder of an individual on the expressway (“🤣🤣 what happen to your man's in the eway 🤣”). FNU responds by referencing a murder taking place on Brook street (“Brook st ♫ ♫ ♫”).³⁰ SANTOS then tells him that the Trinitarios have killed more GDs and that FNU and the GDs should commit more

³⁰ The pitchfork is a symbol used by the Gangster Disciples.

violence as opposed to sending messages through his cellular phone (“We up in the scoreboard idk why u texting me u should be the one spinning”). SANTOS then references four historical murders committed by the Trinitarios targeting suspected members of the Gangster Disciples: Nike Colon, Ewdy Lopez, a/k/a “Timmy Brook”, Jathien Amador, and Carlos Rivera (“Nike Timmy jay ebk Carlos”). FNU responds that SANTOS did not personally commit those four murders, so he should stop naming them (“Shit you ain’t do 😂”).

DATE - TIME	AUTHOR	CONTENT
11/16/2023 4:06:12 AM(UTC-5)	SANTOS	Lmfaoo u soft u saw me didn't even did shit I didn't even see u if I did u wouldn't be here my son on gvng
11/16/2023 4:06:22 AM(UTC-5)	SANTOS	Do*
11/16/2023 4:07:01 AM(UTC-5)	SANTOS	We not the same I really be outside
11/16/2023 4:07:12 AM(UTC-5)	SANTOS	Katch me when u do
11/16/2023 4:07:20 AM(UTC-5)	SANTOS	Just don't let me katch u
11/16/2023 4:07:27 AM(UTC-5)	SANTOS	I don't even know who u are
11/16/2023 4:07:30 AM(UTC-5)	SANTOS	U know bout me
11/16/2023 4:07:36 AM(UTC-5)	SANTOS	Your a fan 🤦
11/16/2023 4:07:58 AM(UTC-5)	FNU-LNU	Shut up bitch nigga you can't even write the right way
11/16/2023 4:08:35 AM(UTC-5)	SANTOS	I'm a bitch but u didnt do nun 🤦
11/16/2023 4:08:41 AM(UTC-5)	FNU-LNU	Outside in when you really be hiding it's crazy to me 😂
11/16/2023 4:09:15 AM(UTC-5)	SANTOS	How im hiding if I pulled up to u
11/16/2023 4:09:23 AM(UTC-5)	SANTOS	I bet u won't do the same
11/16/2023 4:09:34 AM(UTC-5)	SANTOS	Pull up to lynn ima be waiting
11/16/2023 4:09:37 AM(UTC-5)	SANTOS	Cook st
11/16/2023 4:09:46 AM(UTC-5)	SANTOS	What's up we matchin or what
11/16/2023 4:10:01 AM(UTC-5)	SANTOS	And don't worry no camera so feel free to do u
11/16/2023 4:10:38 AM(UTC-5)	SANTOS	Lmk kuz u already waste my time once
11/16/2023 4:11:17 AM(UTC-5)	FNU-LNU	E4 Timmy pussy
11/16/2023 4:11:38 AM(UTC-5)	SANTOS	Who tf is Timmy
11/16/2023 4:11:46 AM(UTC-5)	SANTOS	Yo what u bang pussy ass nikka
11/16/2023 4:12:03 AM(UTC-5)	FNU-LNU	GDN
11/16/2023 4:12:24 AM(UTC-5)	SANTOS	🤦‍♂️🤦‍♂️ what happen to your man's in the eway 🤦‍♂️
11/16/2023 4:12:36 AM(UTC-5)	FNU-LNU	Brook st 💯 💯 💯
11/16/2023 4:13:06 AM(UTC-5)	SANTOS	We up in the scoreboard idk why u texting me u should be the one spinning
11/16/2023 4:13:25 AM(UTC-5)	SANTOS	Do u homework kuz we ready when ever
11/16/2023 4:16:52 AM(UTC-5)	FNU-LNU	I'm the one in the right make sure you remember me 💯 💯 💯
11/16/2023 4:17:23 AM(UTC-5)	SANTOS	We up remember that
11/16/2023 4:17:34 AM(UTC-5)	FNU-LNU	Up on who ?
11/16/2023 4:17:37 AM(UTC-5)	SANTOS	gdn to my dick
11/16/2023 4:17:46 AM(UTC-5)	FNU-LNU	Lol all ya nigga crackheads
11/16/2023 4:18:02 AM(UTC-5)	SANTOS	Nike Timmy jay ebk Carlos
11/16/2023 4:18:13 AM(UTC-5)	FNU-LNU	Shit you ain't do 😂

328. The conversation continues and SANTOS rhetorically asks if he should start naming the incidents he is responsible for (“U want me to start naming”). SANTOS then states that the Trinitarios are up in terms of violence and the GDs should retaliate (“We up come spin”). SANTOS then tells FNU to inform another GD named “Spazz” to watch out because SANTOS knows where he lives or frequents, and will kill him (“Tell spazz to watchout”, “Ik where he be at”, “Still gd right so just tell him to watch out I’m on his ass”). FNU then claims that SANTOS sounded like a federal law enforcement officer, based on how he was discussing gang business (“Ur the feds”). SANTOS then tells FNU that SANTOS has already shot two rival gang members and taunts FNU by referencing the murder of Nike Colon, and tells FNU to not become his third victim. (“I got 2 ask bout me”, “Smokin on Nike rn 🎤”, “Don’t be the 3rd one”).

DATE - TIME	AUTHOR	CONTENT
11/16/2023 4:18:16 AM(UTC-5)	SANTOS	U want me to start namin
11/16/2023 4:18:24 AM(UTC-5)	FNU-LNU	Like how you take time of your day for that ?
11/16/2023 4:18:29 AM(UTC-5)	FNU-LNU	[PHOTOGRAPH]
11/16/2023 4:18:49 AM(UTC-5)	SANTOS	You're the feds I'm done with u askin too much
11/16/2023 4:18:54 AM(UTC-5)	SANTOS	We up come spin
11/16/2023 4:19:01 AM(UTC-5)	SANTOS	Lmk if u pullin up
11/16/2023 4:19:10 AM(UTC-5)	SANTOS	Tell spazz to watchout
11/16/2023 4:19:16 AM(UTC-5)	SANTOS	Ik where he be at
11/16/2023 4:19:24 AM(UTC-5)	FNU-LNU	I already got mines 😂
11/16/2023 4:19:31 AM(UTC-5)	FNU-LNU	What you don't know
11/16/2023 4:20:12 AM(UTC-5)	FNU-LNU	Spazz don't be chilling with Brook niggas that nigga not even from around the city
11/16/2023 4:20:50 AM(UTC-5)	SANTOS	Still gd right so just tell him to watch out I'm on his ass
11/16/2023 4:21:15 AM(UTC-5)	FNU-LNU	I know something you don't know 😂
11/16/2023 4:21:43 AM(UTC-5)	FNU-LNU	Cause I did it 🌟🔥
11/16/2023 4:21:58 AM(UTC-5)	FNU-LNU	Stop calling me rat ass nigga
11/16/2023 4:22:20 AM(UTC-5)	SANTOS	You're a bixch u ain't did nun
11/16/2023 4:22:30 AM(UTC-5)	FNU-LNU	What ur Gone rat cause I said that
11/16/2023 4:22:45 AM(UTC-5)	FNU-LNU	Pick him up ↑🏀
11/16/2023 4:22:47 AM(UTC-5)	SANTOS	Now check the scoreboard and ask bout me kuz we not the same
11/16/2023 4:23:14 AM(UTC-5)	SANTOS	Lmfaoo im not u i stay solid ask bout me like I said
11/16/2023 4:23:31 AM(UTC-5)	FNU-LNU	I did asked bout you and they say u be running Ricky everytime in salem 😂
11/16/2023 4:24:01 AM(UTC-5)	FNU-LNU	Remember I grow up with niggas u beefing with fuck nigga

11/16/2023 4:24:11 AM(UTC-5)	SANTOS	Funny how I don't even be in salem 🤣🤣 don't even remember last time I went to salem
11/16/2023 4:24:15 AM(UTC-5)	FNU-LNU	Ur the feds
11/16/2023 4:24:33 AM(UTC-5)	FNU-LNU	Like how ur sounds saying names of people that you ain't killed ?
11/16/2023 4:24:43 AM(UTC-5)	FNU-LNU	Ⓜ️😂
11/16/2023 4:24:52 AM(UTC-5)	FNU-LNU	😂Ⓜ️
11/16/2023 4:24:55 AM(UTC-5)	SANTOS	I got 2 ask bout me
11/16/2023 4:25:03 AM(UTC-5)	SANTOS	Smokin on Nike rn 🤣
11/16/2023 4:25:23 AM(UTC-5)	SANTOS	Don't be the 3rd one

S. 12/26/2023, ATTEMPTED MURDER OF TRINITARIO MEMBERS AT PIZZA HUT

329. Investigators are familiar with an incident that took place on December 26, 2023, at a Pizza Hut in Lynn, MA. During this incident, multiple Trinitarios members were targeted by rival TRG gang members and shot. All three victims survived. This incident would serve as the basis for retaliation by the Trinitarios the following day.

330. According to Lynn Police Report #23087213, on Tuesday, December 26, 2023, at approximately 8:30 PM, Lynn Police responded to the Pizza Hut located at 29 State Street, Lynn, MA. Ultimately it was determined that two individuals had been shot in the Pizza Hut. The victims of this shooting were Trinitario members MICHAEL MILIANO, A/K/A “TRUCHO,” and YEFFERSON VALLECILLO CAMBAR, A/K/A “ILLUMINATI”, and a Trinitario associate. The three Trinitarios had travelled to the Pizza Hut in a vehicle owned by DARWIN BATISTA, A/K/A “PY” that was located on scene. MILIANO had been shot in his face, near his eye. VALLECILLO has been shot in his abdomen. The associate was shot seven times, including in his abdomen, arm, leg and scrotum.

331. The investigation led to the charging of two individuals for the shooting, William Baez and Delvin Sanchez. *See Commonwealth v. Baez*, Essex Superior Court, Docket No. 2477CR00195; *Commonwealth v. Sanchez*, Essex Superior Court, Docket No. 2477CR00023. Baez and Sanchez are known by investigators to be members of the Tiny Rascals Gang or TRG.

T. 12/27/2023, CREATION OF GROUP CHAT TO DISCUSS RETALIATION

332. During the course of the investigation, investigators located a chat conversation between PAULA-CABRAL and LUIS JEFFREY SANTANA, A/K/A “SOPITA” regarding the creation of a new Trinitarios group chat the day after the Pizza Hut shooting. Multiple cooperating witnesses have described this group chat as being used for the express purpose of coordinating retaliation by the Trinitarios in response to the December 26, 2023, Pizza Hut shooting. According to multiple cooperating witnesses, PAULA-CABRAL, SANTOS and other leaders and members were active in the chat. Prior to forming this group chat, PAULA-CABRAL and JEFFREY SANTANA discussed its creation over text messages and audio messages.

333. At 3:35 PM on December 27, 2023, PAULA-CABRAL sent a message to JEFFREY SANTANA stating, “WE NEED TO MAKE ANOTHER CHAT EN SIGNAL AGAIN” and that “Truco and Iluminaty got hit last night.” JEFFREY SANTANA acknowledges that the Trinitarios were hit, and PAULA-CABRAL sends a link to a news article about the shooting. They then discuss which third party application to use, Telegram or Signal. PAULA-CABRAL asks JEFFREY SANTANA to choose the application that they will use and notes that he deletes messages from both applications. PAULA-CABRAL indicates that he wants to use the application that is “safer” for the organization (“Up to u signal or telegram”, I delete both but just check which one you think is safer for us”). JEFFREY SANTANA asks who should be included in the new group chat. PAULA-CABRAL states that the “big” members and the old members should be made a part of the chat as well. About three hours later, JEFFREY SANTANA reports to PAULA-CARBAL that almost all of the Lynn members are in the chat, but that no “minors” are in the chat (“Almost all the ones from Lynn are included”). JEFFREY SANTANA then tells PAULA-CABRAL that everyone is in the chat waiting for PAULA-CABRAL to join it, and, inferably, get his orders (“But get in it, dude, we are just waiting for you, because everybody is asking where

[STAMMERS] for what is that chat for.”). This conversation, preliminarily translated from Spanish, follows:

AUTHOR / DATE-TIME / FILENAME	MESSAGE
Enmanuel Paula 12/27/2023, 3:35:29PM	What's up, bro? God with us.
SOPITAAAX NH 12/27/2023, 3:35:44PM	What's up?
Enmanuel Paula 12/27/2023, 3:35:50 PM	WE NEED TO MAKE ANOTHER CHAT EN SIGNAL AGAIN (in English)
Enmanuel Paula 12/27/2023, 3:36:17 PM	Trucho and Iluminaty got hit last night
SOPITAAAX NH 12/27/2023, 3:36:25 PM	That's what I heard.
Enmanuel Paula 12/27/2023, 3:36:31 PM	[LINK TO ARTICLE] PIZZA-HUT-SHOOTING-LYNN-MASSACHUSETTS 
Enmanuel Paula 12/27/2023, 3:36:53 PM	We have to do it on Telegram but we have to create one.
SOPITAAAX NH 12/27/2023, 3:37:46 PM	Up to u signal or telegram
Enmanuel Paula 12/27/2023 3:40:06PM	I delete both but just check which one you think is safer for us
Enmanuel Paula 69e8ebd4-d8b3-4bda-97c8-d90722244bc2.opus 12/27/2023 3:40:15PM	The only thing if you decide for Telegram, you will have to do the [COUGHS] the close talk App Verification.
SOPITAAAX NH 12/27/2023 3:40:31PM	Signal is better.
Enmanuel Paula 12/27/2023 3:54:28 PM	Sounds good.
SOPITAAAX NH 12/27/2023 6:21:35 PM	Should I included the ones from NH as well or no?
Enmanuel Paula 12/27/2023 6:21:55 PM	Add the big ones and the old ones.
SOPITAAAX NH 12/27/2023 6:22:15 PM	Almost all the ones from Lynn are included.
SOPITAAAX NH 12/27/2023 6:22:27 PM	There are no minors in there.

Enmanuel Paula 12/27/2023 8:49:25 PM	Sounds good, bro, thank you.
SOPITAAX NH 29de883c-8e34-4748- bbc0-25d11fca6315.opus 12/27/2023 8:49:58 PM	But get in it, dude, we are just waiting for you, because everybody is asking where [STAMMERS] for what is that chat for.
Enmanuel Paula 12/27/2023 8:52:26 PM	Alright.

U. 12/27/2023, DOUBLE MURDER, CONSPIRACY TO MURDER

334. I am familiar with the facts related to the December 27, 2023, double murder of Kyle Mel and Isaiah Acevedo in Lynn, MA, that took place while Mel, Acevedo and a third surviving victim were walking down the street. Based upon information from multiple cooperating witnesses and other evidence recovered in the case, I know that the Trinitarios are responsible for the shooting and targeted the victims in retaliation for the attempted murder of Trinitario members the night before at the Pizza Hut. Based on the investigation, I know that ANGEL SANTOS fired a fully automatic handgun from the passenger seat, and that DAVID GARCIA was the driver during this shooting. Multiple cooperating witnesses also identified PAULA-CABRAL as authorizing retaliation against rival gang members, which resulted in this double murder.

i. Initial Police Response

335. On December 27, 2023, at approximately 10:25 PM, Lynn Police responded to a 911 call for a person shot in the area of 969 Western Avenue. Lynn Police arrived and were directed to #3-5 Camden Street where two victims of gunshots were found. Kyle Mel was found by first responders lying face down and unresponsive with a gunshot wound to the chest. Mel had a loaded firearm under his person which was recovered as police rendered aid. Isaiah Acevedo was found by first responders laying on his back unresponsive with gunshot wounds to his chest and leg. Medics arrived and transported both Mel and Acevedo to Salem Hospital where they were pronounced dead on December 27, 2023.

336. Through a preliminary review of the scene, Officers located 30 discharged shell casings in the street near 3-5 Camden Street. Twenty-five of the casings were 9mm, and five casing were .40 caliber.

337. The investigation led to the identification of a surviving witness who was with Mel and Acevedo during the incident. This surviving witness was interviewed and stated that he, Mel and Acevedo had walked from a nearby vape store, through the intersection of Summer Street, River Street and Burns Street, onto River Street and then onto Camden Street. While walking on Camden Street, a vehicle pulled up to them and stopped. The passenger asked them “who they were with”, and Mel responded “Westside” referring to the Westside World gang. At that point, the passenger of the vehicle opened fire with a fully automatic weapon and the group tried to take cover. After the vehicle left, the surviving victim took Acevedo’s firearm from his body and fled the scene, fearing that the vehicle would return.

ii. Surveillance Video

338. Surveillance video was obtained from surrounding businesses. Exterior cameras from multiple businesses on Camden Street all captured the shooting. Multiple cameras in fact captured audio of the incident as well.

339. Surveillance depicted Mel, Acevedo and the surviving victim walking on Camden Street from River Street. A dark colored sedan, traveling from the same direction as the victims, came from behind and stopped alongside them, stopping in the roadway.



340. Audio from one of the cameras captured Mel say “Westside World” right before shots were fired from the front passenger side of the sedan towards the victims. Mel can be observed returning fire towards the vehicle in his flight for cover behind parked vehicles. It is believed that the five .40 caliber casings were fired by Mel as he ran for cover. Acevedo and the third surviving victim sought cover behind a parked pick-up truck. The gunshots from the suspect vehicle were fast and continuous, and audibly consistent with an automatic firing mode. In the still images that follow, dust and debris from multiple impacts of the rounds discharged by the machinegun can be seen exploding off the concrete exterior of the building behind the victims. Additionally, the muzzle flash from the passenger’s handgun can be seen emanating from outside of the passenger window of the suspect vehicle.



341. The suspect vehicle fled down Camden Street towards Cooper Street. Acevedo collapsed from gunshot wounds behind a pick-up truck in front of 5 Camden Street. Mel collapsed from a gunshot wound in front of the garage bay door of 3 Camden Street. The surviving victim was not struck and subsequently ran to 49 Camden Street where a resident there called 911 approximately 5 minutes after the shooting occurred.

342. The video evidence captured unique details of the suspect vehicle. The camera footage from 10 Camden Street was able to obtain a faint license plate of "4RMF27". RMV records indicated that the vehicle bearing license plate 4RMF27 was a 2013 Black Honda Accord registered to ABEL SEVERINO REYES, of 606 Summer Street #2, Lynn, MA. Cameras captured the suspect vehicle and revealed the blurry image of GARCIA operating the vehicle, and a husky silhouette seated low in the passenger seat that is consistent with ANGEL SANTOS.



iii. Cell Site Location Information

343. Investigators obtained CSLI for cellular phones known to have been used by DAVID GARCIA and ANGEL SANTOS on the date of December 27, 2023. Review of the CSLI shows that GARCIA made a call to SANTOS at approximately 10:15 PM on December 27, 2023, which is approximately 6 minutes before the shooting.

344. Both the phone used by GARCIA and the phone used by SANTOS for this call at 10:15 AM, employed a cell tower located within approximately 1000 feet of the crime scene, and 500 feet from 606 Summer Street, Lynn, MA, the residence of ABEL SEVERINO REYES.

345. On December 30, 2023, at 7:42 PM, the phone used by GARCIA employed a cell tower within 3000 feet of 38 Keys Drive, Peabody, MA.

iv. Communications with PAULA-CABRAL After the Murder

346. About 90 minutes after the double murder, SANTOS (using a phone ending in 0985 that he is known to use and saved as “Bigada”) sent text messages to PAULA-CABRAL telling him that it is urgent and they must speak. Those messages follow:

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	manito, it's urgent	12/27/2023 11:48:31 PM(UTC-5)
SANTOS	Call me father, ASAP	12/27/2023 11:48:40 PM(UTC-5)

347. PAULA-CABRAL also had a series of FaceTime calls to and from SANTOS. These FaceTime calls took place shortly after the Pizza Hut shooting, as well as before and after the December 27, 2023, double murder.

TO / FROM	DATE / TIME OF CALL	DURATION	DIRECTION	ANSWERED	TYPE OF CALL
From: +12078810985 Bigada	12/26/2023 8:39:25 PM(UTC-5)	00:01:02	Incoming	Yes	FaceTime
To: +12078810985 Bigada	12/26/2023 10:04:45 PM(UTC-5)	00:01:37	Outgoing	Yes	FaceTime
To: +12078810985 Bigada	12/27/2023 12:39:42 AM(UTC-5)	00:00:19	Outgoing	Yes	FaceTime
From: +12078810985 Bigada	12/27/2023 12:40:15 AM(UTC-5)	00:03:07	Incoming	Yes	FaceTime
To: +12078810985 Bigada	12/27/2023 10:27:40 AM(UTC-5)	00:00:00	Outgoing	Yes	FaceTime
From: +12078810985 Bigada	12/27/2023 10:28:16 AM(UTC-5)	00:00:28	Incoming	Yes	FaceTime

From: +12078810985 Bigada	12/27/2023 10:30:48 AM(UTC-5)	00:00:00	Incoming	Yes	FaceTime
To: +12078810985 Bigada	12/27/2023 10:31:26 AM(UTC-5)	00:03:22	Outgoing	Yes	FaceTime
To: +12078810985 Bigada	12/27/2023 10:55:30 AM(UTC-5)	00:02:27	Outgoing	Yes	FaceTime
From: +12078810985 Bigada	12/27/2023 11:48:02 PM(UTC-5)	00:00:09	Incoming	Yes	FaceTime
To: +12078810985 Bigada	12/28/2023 12:06:55 AM(UTC-5)	00:01:43	Outgoing	Yes	FaceTime
From: +12078810985 Bigada	12/28/2023 12:08:53 AM(UTC-5)	00:00:11	Incoming	Yes	FaceTime
From: +12078810985 Bigada	12/28/2023 2:59:46 AM(UTC-5)	00:07:48	Incoming	Yes	FaceTime
To: +12078810985 Bigada	12/28/2023 3:51:54 AM(UTC-5)	00:01:02	Outgoing	Yes	FaceTime

v. Cooperating Witness Information

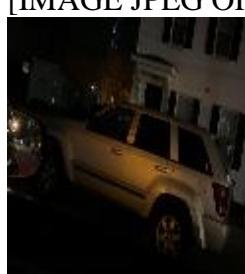
348. Multiple cooperating witnesses provided information to investigators regarding the December 27, 2023, double murder.

- a. CW-16 provided information about this double murder. CW-16 stated that this double murder was in response to the shooting on December 26, 2023 at the Pizza Hut where Trinitarios members were shot. CW-16 stated that the Trinitarios formed a group chat on the Signal application to discuss violence in response to the Pizza Hut shooting. The members of this group chat included: PAULA-CABRAL, SANTOS, JORDANI, JEFFREY SANTANA, ENRIQUE SANTANA, DARWIN BATISTA, ROMAN, and ALBA. The group discussed that retaliation had to occur and that the Trinitarios could not let this happen without responding. CW-16 stated that GARCIA and SANTOS spoke with CW-16 shortly after the December 27, 2023, double murder. GARCIA and SANTOS explained to CW-16 that SANTOS had shot and killed two rival gang members, and that GARCIA was driving the vehicle at the time. CW-16 stated that GARCIA was blessed into the TRINITARIOS as a full member by PAULA-CABRAL after this shooting.
- b. CW-19 provided information about this double murder. CW-19 stated that SANTOS shot and killed the victims of the December 27, 2023, double murder using a fully automatic handgun. CW-19 stated that GARCIA was driving the vehicle during this incident. CW-19 stated that a few days after the double murder, GARCIA brought the vehicle used in the double murder to PAULA-CABRAL's house, because PAULA-CABRAL instructed GARCIA to do so.

V. 4/2/2024 CONSPIRACY TO MURDER RIVAL GANG MEMBERS

349. Investigators located a chat conversation between JEFFREY SANTANA, A/K/A “SOPITA” and PAULA-CABRAL taking place over text message and audio message. During the conversation, which is in Spanish, JEFFREY SANTANA (listed as SOPITAXX NH) and PAULA-CABRAL (listed as Enmanuel Paula) discuss and organize a shooting to be committed by multiple Trinitarios targeting an SUV that JEFFREY SANTANA has identified that is believed to be used by rival gang members. The following description of that conversation is based on a preliminary transcription of that conversation.

350. JEFFREY SANTANA sent PAULA-CABRAL a picture of a grey SUV. In the conversation, JEFFREY SANTANA identified it as a vehicle being used by rival gang members, and stated that there were three rivals inside of the car. PAULA-CABRAL advises JEFFREY SANTANA to send the picture of the SUV to the other Trinitarios (“Send that suv to the guys.”). JEFFREY SANTANA states that he already did so (“Yeah, I already sent it.”).

AUTHOR / FILENAME / DATE - TIME	CONTENT – PRELIMINARILY TRANSLATED
SOPITAXX NH 4/3/2024 2:54:59 AM	[IMAGE JPEG OF A GREY SUV] 
SOPITAXX NH 4/3/2024 2:55:01 AM	One like that.
Enmanuel Paula 4/3/2024 2:55:10 AM	Yes.
Enmanuel Paula 4/3/2024 2:55:20 AM	That's what Bori said.
SOPITAXX NH 4/3/2024 4:28:40 AM	[IMAGE JPEG OF A BLUE SUV]

	
SOPITAAX NH 4/3/2024 4:28:43 AM	That's how it is.
SOPITAAX NH 4/3/2024 4:28:43 AM	I'm already inside.
SOPITAAX NH 4/3/2024 4:29:05 AM	The thing is that I don't want that cocksucker to do something stupid and shoot innocent people.
SOPITAAX NH 4/3/2024 4:29:08 AM	Or the house.
Enmanuel Paula 4/3/2024 4:29:14 AM	What happened?
Enmanuel Paula 4/3/2024 4:29:18 AM	Talk to me.
SOPITAAX NH 4/3/2024 4:29:21 AM	It escaped.
SOPITAAX NH 4/3/2024 4:29:27 AM	But he is wandering.
Enmanuel Paula 4/3/2024 4:29:44 AM	Send that suv to the guys.
Enmanuel Paula 4/3/2024 4:29:49 AM	Did you see the plate?
SOPITAAX NH 4/3/2024 4:29:51 AM	Yeah, I already sent it.
SOPITAAX NH 4/3/2024 4:29:54 AM	[REPLY TO: Did you see the plate?] No.

351. JEFFREY SANTANA indicates he has a firearm on him (“I have mine on me.”).

JEFFREY SANTANA states there are three rival gang members in the vehicle that are targeting him (“I’m on it, but it’s three (3) of them and I’m just one.”). PAULA-CABRAL asks if they are “Geingo, JV and Pagan” and JEFFREY SANTANA agrees. PAULA-CABRAL tells JEFFREY SANTANA that this will be handled and the Trinitarios will apply “pressure” to the rival gang members, which means to commit violence (“Let’s put some pressure on them, don’t worry.”). PAULA-CABRAL then asks JEFFREY SANTANA if his gun has cheese on it, to which

JEFFREY SANTANA states no (“Does yours have cheese?” “No.”). PAULA-CABRAL instructs JEFFREY SANTANA to install a machinegun conversion device on his firearm and get three magazines of ammunition (“Put on some cheese on it and get 3 magazines.”).³¹ I reasonably believe, based on information from cooperating witnesses, that putting cheese on a firearm means attaching a selector switch to the weapon so that it can fire fully automatic.

AUTHOR / FILENAME / DATE – TIME	TRANSLATED
Enmanuel Paula 4/3/2024 4:30:03 AM	We need to set him straight.
SOPITAAX NH ed7b9ff9-f030-46ce-8f3c-dd4c7424f69c.opus 4/3/2024 4:30:04 AM	Brother, the plate doesn’t have any light; it doesn’t have light at the back. It doesn’t have anything, bro, it seems like a huffy [PH], bro, of the emissions.
Enmanuel Paula 4/3/2024 4:40:18 AM	He came out for that.
Enmanuel Paula 4/3/2024 4:40:27 AM	Get on it because they are about to take you out.
Enmanuel Paula 4/3/2024 4:40:38 AM	And I don’t want to go through that again.
SOPITAAX NH 4/3/2024 4:41:03 AM	I’m on it, but it’s three (3) of them and I’m just one.
SOPITAAX NH 4/3/2024 4:41:09 AM	By the time that the thugs get here.
SOPITAAX NH 4/3/2024 4:41:17 AM	But I have mine on me.
Enmanuel Paula 4/3/2024 4:41:58 AM	Which three (3), Geingo, JV and Pagan?
SOPITAAX NH 4/3/2024 4:42:06 AM	Yes.
Enmanuel Paula 4/3/2024 4:42:35 AM	Let’s put some pressure on them, don’t worry.
Enmanuel Paula 4/3/2024 4:44:17 AM	Do you have the number for the guy from Duarte?
Enmanuel Paula 4/3/2024 4:44:18 AM	?
Enmanuel Paula	Does yours have cheese?

³¹ A cooperating witness informed investigators that the phrase “cheese” refers to a “selector switch” or machinegun conversion device used to convert a Glock firearm to a fully automatic weapon.

4/3/2024 4:44:31 AM	
SOPITAAX NH 4/3/2024 4:44:34 AM	No.
Enmanuel Paula 4/3/2024 4:44:46 AM	Put on some cheese on it and get 3 magazines.
SOPITAAX NH 4/3/2024 4:45:06 AM	Let me see if I could get that.

352. JEFFREY SANTANA confirms he is bringing multiple Trinitarios, including DARWIN BATISTA and “Forty”, and will inquire if SANTOS and DIAZ LIRANZO are coming (“I’m going to bring down Pyy”, “Forty is coming on Saturday”, “I’m going to see what’s up with Biggie and El Sosa, if they are coming”). PAULA-CABRAL then confirms that the vehicle has a green light on it, and it will be shot on sight (“The mission for the thugs is, wherever they see that suv, they have the green light to burn it and if by tomorrow Gtro doesn’t tell us anything, the mission is a go.”). PAULA-CABRAL instructs JEFFREY SANTANA to talk with DIAZ LIRANZO, SANTOS and a Trinitario named “Pookie” and states that he has already spoken to them and GARCIA as well. (“Talk to Sosa and Biggie” “Talk to Pookie” “They are clear already, I already spoke to them and Bambino too.”). PAULA-CABRAL states that he can send GARCIA and DARWIN BATISTA as well because “[t]hey are a good team.” PAULA-CABRAL insists that they “are going to set an example here” in terms of targeting the rival gang members.

AUTHOR / FILENAME / DATE – TIME	CONTENT – PRELIMINARILY TRANSLATED
SOPITAAX NH 4/3/2024 4:45:47 AM	But I’m going to bring down Pyy.
SOPITAAX NH 4/3/2024 4:45:52 AM	Forty is coming on Saturday.
SOPITAAX NH 4/3/2024 4:46:05 AM	I’m going to see what’s up with Biggie and El Sosa, if they are coming.
Enmanuel Paula 4/3/2024 4:46:13 AM	The mission for the thugs is, wherever they see that suv, they have the green light to burn it and if by tomorrow Gtro doesn’t tell us anything, the errand is a go.
Enmanuel Paula 4/3/2024 4:46:26 AM	[REPLY TO: I talk to him through snap.] Call him, he knows Gringo.
Enmanuel Paula	Talk to Sosa and Biggie.

4/3/2024 4:46:57 AM	
Enmanuel Paula 4/3/2024 4:47:10 AM	Talk to Pookie.
SOPITAAX NH 4/3/2024 4:49:01 AM	I'm going to call him.
SOPITAAX NH 4/3/2024 4:49:19 AM	He is saying that he needs to tell me a few things.
Enmanuel Paula 4/3/2024 4:49:28 AM	They are clear already, I already spoke to them and Bambino too.
SOPITAAX NH 4/3/2024 4:49:29 AM	But he couldn't because the woman was there.
Enmanuel Paula 4/3/2024 4:49:35 AM	We can send down Bambino and Py.
SOPITAAX NH 4/3/2024 4:49:45 AM	They gave him a light.
Enmanuel Paula 4/3/2024 4:49:46 AM	They are a good team.
SOPITAAX NH 4/3/2024 4:49:55 AM	Bambino is in NJ.
Enmanuel Paula 9d5493c4-2a9c-417a-b739-d10dbb4131bc.opus 4/3/2024 4:50:19 AM	No, I don't know, but he has to get moving. Meaning, whenever they come down, they are coming down tomorrow, I think. When they get here, I'm going to talk to him.
Enmanuel Paula 4/3/2024 4:50:51 AM	We are going to set an example here.

353. JEFFREY SANTANA then replies that he has sent the message for the Trinitarios to gather weapons and discusses their options for firearms (“No, yes we are moving. I activated the thugs today, bro. Last night I told, uh, uh, Jose Wawa to get one from Fuga; they went and got one. [U/I] got a Glock 27, uh, Sonrisa has his; Walkie [PH] has his. Uh, Willie has a few nice things there, so once they thugs come down they are going to get have it in their hands. I don’t know what they want; if they want something big or small, but they we have a lot of everything there. Willie is being careful, very careful.”). PAULA-CABRAL indicates that he has already spoken to GARCIA (“Bambi”) and he is ready for the mission (“Uh, Bambi [PH] is also ready, I already spoke to him.”). Then, PAULA-CABRAL tells JEFFREY SANTANA to keep the number of Trinitarios involved in the mission to under four, because he does not want the information to

spread (“Keep that under the four (4), dude. I don’t want this thing to get bigger, bro. Because there is too many shit filtrating, bro. I don’t want this to continue to expand.”). JEFFREY SANTANA agrees (“I don’t want no one to know anything. I don’t want that, you understand? Because I don’t know who is the one giving out information, bro. But that dude has a lot of information, bro.”).

AUTHOR / FILENAME / DATE – TIME	CONTENT – PRELIMINARILY TRANSLATED
SOPITAAX NH 52d56bb9-3fa3-4f10-8f8e-9879f3bc9a11.opus 4/3/2024 4:51:34 AM	No, yes we are moving. I activated the thugs today, bro. Last night I told, uh, uh, Jose Wawa to get one from Fuga; they went and got one. [U/I] got a Glock 27, uh, Sonrisa has his; Walkie [PH] has his. Uh, Willie has a few nice things there, so once they thugs come down they are going to get have it in their hands. I don’t know what they want; if they want something big or small, but they we have a lot of everything there. Willie is being careful, very careful.
Enmanuel Paula b8ca58f9-4530-4db1-808d-958fb943bf92.opus 4/3/2024 4:52:22 AM	Talk to Pookie; you have to talk to Pookie. Pookie is ready. Uh, Bambi [PH] is also ready, I already spoke to him.
Enmanuel Paula 562e72f5-2e1f-4863-8964-caf60a419529.opus 4/3/2024 4:52:33 AM	Keep that under the four (4), dude. I don’t want this thing to get bigger, bro. Because there is too many shit filtrating, bro. I don’t want this to continue to expand.
SOPITAAX NH 99a710f0-de1f-441d-bc4d-be67dee0e6a2.opus 4/3/2024 4:53:23 AM	This is why I’m calling you privately, bro. Didn’t you see that I didn’t say anything on the chat. For that same reason I told Biggie to call me private, and told him not to mention anything on the chat, because I don’t want no one to know anything. I don’t want that, you understand? Because I don’t know who is the one giving out information, bro. But that dude has a lot of information, bro.

354. The conversation concludes with PAULA-CABRAL stating that the Trinitarios will do what they know how to do best, which in context is, shooting. Then, PAULA-CABRAL instructs JEFFREY SANTANA to call another Trinitario, obtain a firearm (“Get that thing”), be careful when he travels to work (“when you go out to work, be in the lookout”), and keep PAULA-CABRAL informed about “everything.”

AUTHOR / FILENAME / DATE – TIME	CONTENT – PRELIMINARILY TRANSLATED
Enmanuel Paula 4/3/2024 5:04:20 AM	We have to do what we know how to do best.
Enmanuel Paula 4/3/2024 5:08:12 AM	Talk to [another Trinitario].
Enmanuel Paula 4/3/2024 5:08:17 AM	Get that thing.
SOPITAAX NH 4/3/2024 5:08:29 AM	Yeah, Imma text him tomorrow.
Enmanuel Paula 4/3/2024 5:09:22 AM	When you got out to work, be on the look out.
SOPITAAX NH 4/3/2024 5:09:37 AM	I'll call him early tomorrow.
Enmanuel Paula 4/3/2024 5:10:22 AM	Sound good keep me informed with everything.

W. 12/1/2024, TRINITARIOS MEETING

355. On December 1, 2024, CW-27 attended a Trinitario meeting in Manchester, New Hampshire. CW-27 generated an audio recording of the meeting. In attendance were over a dozen members, and multiple leaders of the Lynn Chapter and Manchester Chapter. Among the Trinitarios charged by Indictment who were present for this meeting were the following:

- ERY JORDANI ROSARIO, A/K/A “JORDANI”;
- AARON DIAZ LIRANZO, A/K/A “SOSA”;
- LUIS JEFFREY SANTANA, A/K/A “SOPITA”;
- LUIS ENRIQUE SANTANA, A/K/A “CHIQUITO”;
- JAMES JIMENEZ, and
- ENDY VARGAS, A/K/A “FUGA”

The meeting was largely in Spanish and a draft transcript follows, with explanations of context and meaning where necessary.

356. The meeting began with JEFFREY SANTANA leading the group in a call and response. JEFFREY SANTANA would exclaim the Trinitarios slogan of Dios, Patria, Libertad (translated as “God, Homeland, Liberty”), and the group would exclaim in response, PATRIA!

PARTICIPANT	CONTENT - PRELIMINARILY TRANSLATED
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JEFFREY SANTANA:	Dios, Patria, Libertad!
GROUP:	Patria!
JEFFREY SANTANA:	Dios, Patria, Libertad!
GROUP:	Patria!
JEFFREY SANTANA:	Dios, Patria, Libertad!
GROUP:	Patria!
JORDANI:	No, no, we are going to do it open.
JEFFREY SANTANA:	Open...
JORDANI:	No, no, no. Let's do it like this.

357. JEFFREY SANTANA and JORDANI then begin discussing the status of the organization and what their purpose and mission will be in the short term, including ensuring loyalty and stability of the membership. At one point, JORDANI refers to the numerous members of the Trinitarios who are in prison, and acknowledges that their crimes, including the multiple murders committed by members, are “a family matter” of the Trinitarios organization. JORDANI explains that in order to help those members in jail, a reinvigorated fundo or quota will be collected weekly from all members in the amount of \$20.

JEFFREY SANTANA	The thing is, that I'm used to admiration and everything.
JORDANI:	No, no, no. Let's start. Let's start. Listen, to tell you the truth, you, the ones that are here, are going to have the privilege of joining a family and live a new phase that we are implementing.
JEFFREY SANTANA:	Let's do something, my friend.
JORDANI:	You understand? Right now, what we want is to bring people that contribute respect. That's the first thing.
JEFFREY SANTANA:	PATRIA!
GROUP:	PATRIA!
JORDANI:	To contribute loyalty.

JEFFREY SANTANA:	PATRIA!
GROUP:	PATRIA!
JORDANI:	To contribute family stability,
GROUP:	PATRIA!
	... and to contribute communication.
JEFFREY SANTANA:	PATRIA!
GROUP:	PATRIA!
JORDANI:	You understand? Right now, us, the ones that are here, are enjoying a privilege, because there are others that are in jail, and they are paying a price for the ones that are here.
JEFFREY SANTANA:	That's Patria.
GROUP:	PATRIA!
JORDANI:	You understand? The biggest privilege that you have is that the ones that are in jail, they are giving us, to everyone that's here, the opportunity to run with a responsible family.
GROUP:	PATRIA!
JEFFREY SANTANA:	That's Patria.
JORDANI:	I don't know how you are going to feel, I don't know, but whoever wants to give their opinion, you can feel free to do so, because we don't have a dictatorship here, but those in jail, uh, need our help.
GROUP:	[MUMBLES]
JORDANI:	You understand? So, we as brothers, being responsible, and patriots whom sworn for something, we need to help them.
	[VOICES OVERLAP]
JEFFREY SANTANA:	Patria.
JORDANI:	That is a necessity, not an obligation. Is more than an obligation, because that is a necessity. I don't know if you understand me. So, I expect your collaboration, because, to tell you the truth, whomever doesn't want to collaborate can feel free to say it, and the door is there, unfortunately, because thanks to those people in jail, we gathered here today talking about this, thank God.
	[VOICES OVERLAP]
JEFFREY SANTANA:	Patria.

GROUP:	PATRIA!
JORDANI:	Not all of us are bandits; not all of us are going to get arrested, but since not all of us are bandits, and we are not all going to get arrested, we need to help those who will, if they get caught because of a... [ASIDE: Help me out.] If they get caught due to a behav...for a...
	[VOICES OVERLAP]
HULK:	Because of a family matter.
JORDANI:	Exactly. Thank you, my brother, Hulk [PH]. Uh... You will see a lot of changes, to tell you the truth, us here, we are going to write a new history, which is called Massachusetts and New Hampshire.

358. JEFFREY SANTANA also discusses the need to insulate the leaders such as DIAZ LIRANZO (“SOSA”) and JORDANI from the line members and their crimes (“to get to Jordany, bro, is not going to be easy now, or to get to Sosa, bro, you will have to come to me. Whoever wants to talk to them will have to talk to me, and then I’ll go and talk to them, explain everything to them, so they can get to you”). JEFFREY SANTANA also acknowledges that the members can purchase guns, and buy drugs and sell drugs, which he described in 3.5-gram quantities that is known as an eight-ball (“Everybody here is legal to buy drugs. Everybody here is legal to buy a gun; everybody here is legal to buy... everybody goes and buy their three (3), point five (3.5); sell their three point five (3.5)”).³²

359. JEFFREY SANTANA then admonishes the members, demanding that they all will be working or hustling to earn money. Even those who do not know how to hustle, which I believe to mean sell drugs, can work with “SOSA” and steal phones from Fedex deliveries (“If you want to hustle, and you don’t know where to get something to hustle, there’s him right there, he is always there for you; there’s Sosa. You don’t want to work hustling, so work with the phones, bro, he can put you on Uber [PH], bro; a phone a day, and you can make approximately a hundred (100) bucks,

³² SOPITA references a 3.5 which the amount of an “eight-ball” of drugs or 1/8 of an ounce.

or one hundred and fifty (150) bucks, and you cannot say no, bro"). JEFFREY SANTANA states that the gang will be committing crimes, and making money, and there will no longer be any excuses ("Everyone here, bro, does something legal and illegal, even I; I can't say I don't, everyone does, bro" ... "it's enough, no more games, bro. I'm not playing with this; there is no more games, bro. Is it that you're with us or you moving.").

JEFFREY SANTANA:	SST, don't forget that name, bro. Secret Society of the Trinitarians. Whoever doesn't know what that is, go to Google, go to Sosa, or come to me; Jordani [PH] is also there. However, to get to Jordani, bro, is not going to be easy now, or to get to Sosa, bro, you will have to come to me. Whoever wants to talk to them will have to talk to me, and then I'll go and talk to them, explain everything to them, so they can get to you. You understand? So, what we are going to do moving forward, bro, [STAMMERS] bro, everybody here... nobody in here is eighteen (18); everybody here passes twenty-one (21). Everybody here is legal to buy drugs. Everybody here is legal to buy a gun; everybody here is legal to buy... everybody goes and buy their three (3), point five (3.5); sell their three point five (3.5). Over here everybody hustles, everybody works, and whoever is not able to work, bro, whoever doesn't work, go out and hustle. If you want to hustle, and you don't know where to get something to hustle, there's him right there, he is always there for you; there's Sosa. You don't want to work hustling, so work with the phones, bro, he can put you on Uber [PH], bro; a phone a day, and you can make approximately a hundred (100) bucks, or one hundred and fifty (150) bucks, and you cannot say no, bro. Everyone here, bro, does something legal and illegal, even I; I can't say I don't, everyone does, bro. So, we are, we are on something, bro, that... it's enough, no more games, bro. I'm not playing with this; there is no more games, bro. Is it that you're with us or you moving.
GROUP:	PATRIA!
JEFFREY SANTANA:	You're with us, or you're moving, bro. Because everyone here is hustling. Everyone here has their kid—he has two (2) kids, and maybe even more than that, that he doesn't even know, who knows.

360. JEFFREY SANTANA then explains the necessity of paying into the fundo or quota, which will be \$30 per member per week. JEFFREY SANTANA warns the members that if they do not pay, then he will triple it to \$90 after two warnings. JORDANI and DIAZ LIRANZO agree with these rules and add that after the "second one, you already know what is coming", which is corporal punishment. JEFFREY SANTANA then explains that disciplining the member

by putting them against the wall and beating them is distasteful and should be avoided (“The thing about, about putting one of the brothers against the wall, and hit them with some wood, I don’t like… [STAMMERS] and my guys know that, whenever I used to see one of my brothers getting hit with the wood, I used to turn around, because I don’t like to see my brothers suffer, brother.”). JEFFREY SANTANA then admonishes the members that they need to evolve their thinking and collect money from their girlfriends and female associates, joking that they should charge for the privilege of sexual activity (“Every shorty you fuck, bang, bang, bang [ONOMATOPOEIA], Give me thirty (30) bucks, sweetie. Dick ain’t free, bro. I have always said it, ‘Dick ain’t free.’ You have to pay me for a fuck, at least with a pair of sneakers, a polo-shirt or something.”).

JORDANI:	Of course, and the one that doesn’t have one, is working on it.
JEFFREY SANTANA:	So, so, the quota, bro, that is…
	[VOICES OVERLAP]
UM:	A must.
JEFFREY SANTANA:	You didn’t pay it, this week I’m going to give you a warning, “No problem bro.” next week, you will pay it, I’m going to… that’s already two (2) warnings. The third one, I’m going triple it, and if you triple pay it, bro, I’m going to bring it down to ninety (90), unfortunately.
	[VOICES OVERLAP]
JORDANI:	No… no, there won’t be a third one, bro, you already know, it’s…
	[VOICES OVERLAP]
DIAZ LIRANZO:	From the second one, moving forward.
JORDANI:	… with the second one, you already know what’s coming…
	[VOICES OVERLAP]
JEFFREY SANTANA:	It all depends on the situation they are at, bro. The thing about, about putting one of the brothers against the wall, and hit them with some wood, I don’t like… [STAMMERS] and my guys know that, whenever I used to see one of my brothers getting hit with the wood, I used to turn around, because I don’t like to see my brothers suffer, brother. You understand? So, let’s say, let’s say like, “Oh bro, come because you have a seven (7).” None of that, anymore, bro. You have… you know what you are into, bro.

	You hustle, bro. You put on a pair of Purple jeans; you go out to the club. So, bro, in the seven (7) wee... the week has seven (7) days, and the days have twenty-four (24) hours. If in seven days you can't get thirty (30) bucks for the quota, check yourself. Check yourself, bro, look at yourself in the mirror, "Man, what am I doing wrong, Am I ugly?" Every shorty you fuck, bang, bang, bang [ONOMATOPOEIA], "Give me thirty (30) bucks, sweetie." Dick ain't free, bro. I have always said it, "Dick ain't free." You have to pay me for a fuck, at least with a pair of sneakers, a polo-shirt or something.
GROUP:	[LAUGHTER]
JEFFREY SANTANA:	Even though the guys give away stuff, because I, I give away too, bro, I can't say I don't. Everybody likes to give gifts to someone; everybody gives away gifts. But dick ain't free, bro. "Bang, bang, bang. Five (5). Ten (10); fifteen (15); thirty (30)." I have my quota.

361. JEFFREY SANTANA then explains that the fundo will be used to put money on the books for people in custody, such as TOMY SANCHEZ, A/K/A "MANITO BELLO." JEFFREY SANTANA then admonishes the group that they cannot solely be there for the good times, which he indicates is when they conduct shootings ("I could be there for shootings, but when I want to spend some time with my brothers, no one is there"). JEFFREY SANTANA indicates that the rules will be changing, and the unity will be instilled through mandatory meetings and contributions. JEFFREY SANTANA further reiterates that the members will not know the identities of JORDANI ("RACACHA"). As an example, JEFFREY SANTANA indicates that when DIAZ LIRANZO ("SOSA") was arrested, the police believed they hit the jackpot by arresting a leader ("Neither to Sosa. Bro, when Sosa got caught, jackpot! Why? My [STAMMERS] my man was putting in work. But now is time for him to, to seat back, another nigga that is not known put in work; they are going to forget about him, no, that wasn't him; no one is hanging out with him; no one is sitting with him"). JEFFREY SANTANA also indicates that they will be switching the dates of their universal gathering because the police have learned the meaning of some of their codes and rituals ("And on February twenty-seven (27), bro, they already know about

our date. This year, God willing, I'm going to get the Airbnb, but it won't be on February twenty-seven (27); it might be on the twenty-fifth (25").

JEFFREY SANTANA:	Like that, you won't skip your quota, bro. Like that, you won't get hit with the wood, because you will be running on time. So, the quota, bro, listen what we use the quota for; it used to be twenty (20) bucks before, but how many inmates do we have, bro? Bro, last week, it broke my heart, bro. This week my heart was broken, bro; Thanksgiving and no [STAMMERS] we didn't have the audacity to gather two hundred (200) bucks, to send it to Manito Bello [PH]; to Tommy [PH] or none of the Tribu (Trinitarios), that are locked up inside.
	[VOICES OVERLAP]
JORDANI:	Wait, wait, not everybody here knows them.
JEFFREY SANTANA:	The Tribu that are in jail, bro, it broke my heart, bro, because we didn't do that for the Tribu, bro. So, everybody here went partying, bro, because I saw it, bro. I see, I see, bro; everybody went partying. Everybody was out on the street. Everybody is looking cute, because everybody here is looking cute. Nobody here is wearing Payless.
UM:	Not Chiquito (Small one).
JEFFREY SANTANA:	No, Chiquito has always been ugly, and dirty. But no one here is wearing Payless, bro. Here no one has Payless; Payless doesn't exist anymore, nor does Skechers; everybody's sneakers here exceed a hundred and forty (140) bucks, because the bigger... the bigger the sneaker is, higher the price.
UM:	Of course.
JEFFREY SANTANA:	So, if you have for that, how is it that you... Like our brother Diony [PH] said and told me, bro, no one go to his baby shower, so, how am I supposed to feel about that, bro. I'll gather some, damn man, so I could be there in the good time; I could be there for shootings, but when I want to spend some time with my brothers, no one is there. That's not homeland, bro. Rule number one (1) is unity, bro. So, where there is no unity, there is no nation, bro. And everybody knows the rules here, bro. Everybody knows their rules here. So, what we are going to do now, bro, are changes, bro. Not changes with the guys, because we don't change anybody over here, I know that outside here you don't have a brother—which is your brother and probably you want to bring him to the family, but right now that will be on hold. Look bro, with the observation that we had before, now is going to be stronger, double than that, bro, because not everybody is going to know who Racacha [PH] is. I cannot come and say, "No, because I'm going to bring Ney [PH], and he is going to know who is Racacha." No, nothing like that, bro. Bro, he is here because of him, because of Manuel, and because Deudi [PH], bro, if not, he would not be here, bro. Because he is here because I asked him, "Bro, are those your brothers?" "Yes." I've seen him getting in the car with the guys. So, he is putting himself on the line for the

	guys but cannot be with us? He needs to be here with us, bro. He knows how to be there for us, bro, and the dude is concern about this, bro, and I have never sat with him and talk, "Bro, is like this, like this, like that." No. Someone has to do that, Deudi and the guys should take care of that. Because I already did my job, bro; I complied with them; they are going to comply with us, but they are not going to bring me guys from the street to my house. No one should know who Racacha is, you understand? Neither to Sosa. Bro, when Sosa got caught, jackpot! Why? My [STAMMERS] my man was putting in work. But now is time for him to, to sit back, another nigga that is not known put in work; they are going to forget about him, no, that wasn't him; no one is hanging out with him; no one is sitting with him. But low key we are chilling with him. You feel me? So, those are things, bro, that we are going to clean up, bro. The quota, bro, is going to increase to thirty (30) bucks; ten (10) bucks for the inmates and twenty (20) bucks for the quota, bro. And on February twenty-seven (27), bro, they already know about our date. This year, God willing, I'm going to get the Airbnb, but it won't be on February twenty-seven (27); it might be on the twenty-fifth (25).
UM:	Or on the sixth (6th) of, of, of...
JEFFREY SANTANA:	You understand? They won't know when we are having our celebration.
	[VOICES OVERLAP]
JORDANI:	November five (5) or six (6) ...
DIAZ LIRANZO:	November six (6).
JEFFREY SANTANA:	That's why, dude, it's a day before, if you search for it. You'll see that they— they, forty-one (41), six (6) twelve (12) ...
	[VOICES OVERLAP]
UM2:	Or February twenty-fifth (25).
JEFFREY SANTANA:	... It's four (4), sixteen (16), twelve (12), bro, when you put it all together, because the police were getting it already. The norms changed. The points changed. Every point has its meaning, bro; each point, bro, and we always run with the seven (7) points, bro, and we always have three (3), [STAMMERS] three (3) on us, bro. Right now, I have it on me; everyone here in the room has it. So, like I tell you, bro, is not that I'm minimizing anybody, and no one in here is higher than the "P", bro, including me. The thing is that it's time already, because we are in two thousand twenty... [STAMMERS] bro, have you heard Dobak's [PH] music? Dobak's songs talk about like how he succeeded, how he already... that he is done with probation, that he has four (4) trolls on him; that means that he has security guards, bro. But he is around with his security guards. So, over here look at James, he has his gun license, because he is in Massachusetts. The lazy ones, because there are some in Massachusetts that wake up at whatever

	time they want, but they hustle their money. “James, bro, how did you get it, so I can get mine?” And he will take care of that. You understand?
DIAZ LIRANZO:	Exactly, that’s it.

362. JEFFREY SANTANA then states that another member named “Chulo” will be in charge of new members and will evaluate them for suitability (“Chulo knows about not bringing a new face to him, without knowing; he has to study him first”). In particular, this evaluation process will ensure that historical activity is not disclosed to new members too quickly (“That way it doesn’t happen what already happened, and everybody knows what that is, for not to talk too much about what happened, bro.”). JORDANI also indicates that the group will insulate members from knowing who the leaders are (“What they are not supposed to know, who is who.”), and will keep that information on a need-to-know basis (“Bro, the thing is that someone that is not part of us, is not supposed to know that Sopita has a position, brother. He is not supposed to know that Sosa, like, who Sosa is. This one doesn’t need to know, brother; that so and so is the one that strikes; my bad for calling you “so and so,” you know that”). JORDANI then agrees and confirms the secrecy of the group and the need for all members to contribute (“Everything that happens here stays here. But everybody here needs to contribute.”).

JEFFREY SANTANA:	A new face that you know, Chulo [PH] is going to oversee that. So, Chulo knows... [STAMMERS] that is his brother, Chulo knows about not bringing a new face to him, without knowing; he has to study him first. That way it doesn’t happen what already happened, and everybody knows what that is, for not to talk too much about what happened, bro. You understand? So, we have to clean, put everything clean, bro, so they can talk about us, and say, “Wow, those are decent people, bro; we could even drink with those people.”
DIAZ LIRANZO:	Like in the past, remember?
UM:	Of course.
JORDANI:	We used to get to places, and they would clean and get us something, and stuff, everybody liked us, “He’s there.” You understand?
	[VOICES OVERLAP]

UM:	Of course.
JORDANI:	We can have, new people can join, and I could be around them; however, they are not supposed to know who I am, bro. Because the thing is that I'm always giving love to my guys; I'm always everywhere; I am cool, and I drink a lot of rum, and everything. If I have to smoke with the guys, I'll smoke, they already know that I don't mess around too much with weed anymore, but if I have to hang out and do it, I will do it. What they are not supposed to know, who is who. Bro, the thing is that someone that is not part of us, is not supposed to know that Sopita has a position, brother. He is not supposed to know that Sosa, like, who Sosa is. This one doesn't need to know, brother; that so and so is the one that strikes; my bad for calling you "so and so," you know that...
GROUP:	[LAUGHTER]
JORDANI:	You understand? So, that's not how it is, bro. Everything that happens here stays here. But everybody here needs to contribute.

363. JEFFREY SANTANA then tells the group that communication is key and the members cannot hold grudges against one another. JEFFREY SANTANA states that unity among the member is important because it can undermine their effective in committing violence ("So, when it comes to the point of, 'Hey, go do this mission with this person,' but you two (2) don't get along. How are you going to feel?"). JEFFREY SANTANA then states that another problem is members are getting comfortable, specifically they feel that once they are baptized, they no longer need to commit violence ("the guys, once you baptize them, they get comfortable", "Once they get baptized, 'I already did what I had to do, so I don't have to do anything else, bro.' This goes further than death, bro.").

JEFFREY SANTANA:	Boom! Uh... Communication is the key, that's what we are asking for, bro. If there is a type of way, a bro did something stupid to you, don't keep that grudge, man. "Hey bro, I feel this way, because of this, this and that." and if you cannot take care of the situation with that person, call me, call him; call someone... another brother. Tell him, "Bro, I feel this way..."
	[VOICES OVERLAP]
JORDANI:	"What you think I should do?"
JEFFREY SANTANA:	Don't hold it in, because the more you hold it, bro, is going to fuck with your head, bro. You gonna be, "Yo... damn bro, no, I won't be smoking with that guy, bro, because..." None of that, bro. So, when it comes to the

	point of, "Hey, go do this mission with this person," but you two (2) don't get along. How are you going to feel?
UM:	Bad.
JEFFREY SANTANA:	That's messed up. Go head, bro.
DIAZ LIRANZO:	Also, there is another problem, bro, with the guys; the guys, once you baptize them, they get comfortable.
JEFFREY SANTANA:	That's another thing.
DIAZ LIRANZO:	That... no, that's not... that's the number one (1) thing, bro.
GROUP	[LAUGHTER]
DIAZ LIRANZO:	Once they get baptized, "I already did what I had to do, so I don't have to do anything else, bro. This goes further than death, bro."
GROUP:	Homeland, that's homeland.
DIAZ LIRANZO:	This is beyond death, bro, you know, bro. And whoever doesn't feel that way, you can walk out the door right now, bro; because over here there are a few guys that have bled ugly because of this. They have lost family members because of this. This is not a joke, bro.
JEFFREY SANTANA:	Homeland.
GROUP:	Homeland.

364. DIAZ LIRANZO then tells the group that an individual's status cannot be known by the members and they should not state their status among each other. For instance, the members on "probation" should not say they are in probation. JORDANI states that the members should adhere to the secrecy of the group and not divulge their status or position to anyone ("I'm sorry. It's, it's like Sopita said before, SST, it's a Secret Society; it's secret, bro.").

DIAZ LIRANZO:	And whenever you have a guy that wants to come over here, bro, just think how you got in here, bro. Just think how you used to say, bro. Probation, you cannot say you are in probation...
	[VOICES OVERLAP]
UM:	Of course not.
DIAZ LIRANZO:	...why you are going to tell some guy ... that, that guy is the top one, bro. Because that's... you already know.
UM:	Yes, yes, yes.

DIAZ LIRANZO:	Just tell him like that...
	[VOICES OVERLAP]
JORDANI:	Manito... I'm sorry. It's, it's like Sopita said before, SST, it's a Secret Society; it's secret, bro.
DIAZ LIRANZO:	Of course. Exactly. Of course.

365. JEFFREY SANTANA then tells the group that currently the group is divided because they could not trust all the members. In fact, JEFFREY SANTANA laments that they could not create a group chat to discuss gang activities because they do not trust that the members in that chat will not cooperate with law enforcement.

JEFFREY SANTANA:	So, bro, I want to go back to how things used to be.
GROUP:	For real.
JEFFREY SANTANA:	When it used to be unity for real. Bro, we are in twenty-twenty-four (2024), and we can't even have a group chat, bro, because we are in a situation that we didn't know who to trust in the group chat, because we didn't know who was going to tell on us, bro.
	[VOICES OVERLAP]
GROUP	Mm-hmm. For real. That's the truth.
JEFFREY SANTANA:	You understand? So, what I want is for everyone here to feel comfortable, so that we can have a group chat, bro.
UM:	Of course.
JEFFREY SANTANA:	We can have a group chat, bro, and the [STAMMERS] our conversation won't be leaked.
GROUP:	Won't be leaked. For real. Of course.
JEFFREY SANTANA:	If I say, "Hey, I'm turning left," uh, the Pencos aren't supposed to know that I'm making a left turn, or someone on the street is going to spill the beans, bro.
UM:	Of course.
JEFFREY SANTANA:	Or what are we doing? We are going to know, bro, because [STAMMERS] bro, the faces that are here, are the ones that are, the only one missing are, Canela, Flex that left, and I don't know who else...

366. The group then discusses the reality of consequences taking place for failure to comply with the rules. Specifically, there will be a treasurer responsible for collecting the money

for the fundo and reporting what amounts are available. They then discuss the purposes to which the money will be spent.

UM:	This is when I say that there needs to be a regimen of consequence, bro; whoever does something wrong, we cannot laugh about it, or make a joke of it, like, "No, these guys are messed up, and shit." "No, you did it wrong, and we already told you not to do it, bing-bang there it is your consequence, bro," and that's how they are going to understand...
	[VOICES OVERLAP]
JORDANI:	That's what's coming now.
JEFFREY SANTANA:	That's what's coming now.
UM:	Every time you make a mistake, you are going to be afraid to be at fault, because they are going to give you your consequence.
JEFFREY SANTANA:	That is what's coming now, bro, a treasurer. "We did five hundred (500) this week." We already know it's five hundred (500), "okay bro, uh, I need five hundred (500)." "Alright. [STAMMERS] The month has four (4) weeks.
UM:	We give five hundred (500) [U/I], to tell you the truth, because...
	[VOICES OVERLAP]
JEFFREY SANTANA:	Thirty (30) plus thirty (30) is sixty (60). Thirty (30) plus thirty (30), it's one hundred and twenty (120). We gave you five hundred (500); bro, you have to pay back, two hundred and sixty (260), plus the five-hundred (500). Because we helped him out, but that is coming back to the quota, bro. That is something that by next year; I was telling my friends, dude, in Florida, with the quota, bro. "Okay, there it is, we are going to rent an Airbnb. We are going to do some grocery shopping, and we are going to rent a SUV." From there, all the money that we take bro, boom [ONOMATOPOEIA], is for us to enjoy it, bro.
UM:	Everything will be done, to tell you the truth.

367. JEFFREY SANTANA suggests that the money they spend will not be used to create an internet presence for the gang. Rather, they will impose the rules of a secret society and not advertise themselves. JEFFREY SANTANA states that if you are not willing to abide by those rules then that member will need to leave the gang immediately ("So, if you know that you are not going to be moving like that, bro, we are giving you... we are repeating it, we are giving you the chance; there is the door, bro."). JORDANI then reiterates the fact that if you are not following

the rules and betrayed the gang, that they will kill that member (“If you have information about us, and we have to get to the point that you no longer can be here with us, because you did a betrayal, unfortunately we, you already know, right?”).³³ DIAZ LIRANZO and JORDANI agree and state that today is the last opportunity to leave (“today is the last day you get a chance, today” “Whoever thinks that has something, you can leave today, because after today, bro”). JORDANI explains that they are risking significant jail time by being in this organization and that the sentences will not be short (“Because to tell you the truth, we are risking too much; we are risking freedom. We are an organization, bro; a family which whenever they lock us down, it is for ten (10) years and up that they give us. So, I’m risking ten (10) years of my life”).

JEFFREY SANTANA:	<p>So, whenever they see things like that, they are going to say, “Shit, these guys are really making it. Those guys are doing well. Those guys are not crying poverty. Those guys are killing it in social media and killing people.” None of that, bro. We know what we are, and we are a secret society, bro. So, if you know that you are not going to be moving like that, bro, we are giving you... we are repeating it, we are giving you the chance; there is the door, bro. I don’t want to come to the point that I come to tell JORDANI, “Bro, we spoke to so and so, but so and so, is not up to this. What are we going to do?” He is going to support me, bro.</p> <p>[BACKGROUND: NOISE] “He’s out.” We don’t have to get to that point. Everyone here, bro, has two (2) feet, and can walk...</p>
	[VOICES OVERLAP]
JORDANI:	[U/I] ... also, my bad for interrupting you. I’m going to make it clear one more time. There was a, a person that used to stop me. He is here, he knows how I work and knows me really well; the guys, Cuba [PH], the younglings here, the ones... you know. If you have information about us, and we have to get to the point that you no longer can be here with us, because you did a betrayal, unfortunately we, you already know, right?
DIAZ LIRANZO:	Bro, write-down today’s date, because today is the last day you get a chance, today. Whoever thinks that can leave...
	[VOICES OVERLAP]

³³ CW-27 was asked about the implication of this particular statement and confirmed that JORDANI was threatening the life of any member who informed on the Trinitarios to law enforcement.

JORDANI:	Whoever thinks that has something, you can leave today, because after today, bro....
UM:	Nothing is going to happen.
UM2:	There is no game?
JORDANI:	No, no, no, there is no game; there's nothing, bro. Because to tell you the truth, we are risking too much; we are risking freedom. We are an organization, bro; a family which whenever they lock us down, it is for ten (10) years and up that they give us. So, I'm risking ten (10) years of my life, that I can, that I can be chilling, without any worries, which you are, you are taking away my peace of mind. So, if you are taking away my peace of mind, and I...
	[VOICES OVERLAP]
JEFFREY SANTANA:	We'll see each other.

368. JORDANI and JEFFREY SANTANA then discuss the consequences that will flow from not meeting the requirements of the gang or betraying the gang. JEFFREY SANTANA then states they will kill anyone who does not “move” with the gang. As JORDANI states, “if you don’t move, unfortunately I’ll move you.” JEFFREY SANTANA then states that JORDANI is not threatening anyone, but merely letting them know that the rules will be followed and there will be consequences for not getting in line with the orders from leaders. As JEFFREY SANTANA states, “I don’t have a problem telling JORDANI, ‘Hey, let’s put him in there.’ Boom, he’s gone. People are not going to talk about that because they are... he’s a Tribu. What they are going to say, ‘Oh, a Tribu died.’ But, he’s a Tribu, knowing things about us, bro.”

JORDANI:	You understand? So, if you don’t move, unfortunately I’ll move you. Among families there is a bunch of—of problems.
JEFFREY SANTANA:	And he is not threatening you, bro.
JORDANI:	You understand what I’m saying?
GROUP:	[U/I]
JEFFREY SANTANA:	He is not threatening anybody, simply, bro, you are here, bro, you already know us. You know about one (1) to seven (7).
JORDANI:	Of course.

JEFFREY SANTANA:	...you know his name; you know his seven (7) points. You feel cool wearing jewelry. If you move funny, the guys are going to move funny, bro. I don't have a problem telling JORDANI, "Hey, let's put him in there." Boom, he's gone. People are not going to talk about that because they are... he's a Tribu. What they are going to say, "Oh, a Tribu died." But, he's a Tribu, knowing things about us, bro.
GROUP:	Mm-hmm.

369. After an extensive discussion about the quota or fundo, JORDANI explains that the money is needed for the gang's operations. JORDANI states that the money will be used to support members in jail. JORDANI also reiterates that contributions can be made by those inclined to violence, and those who have artistic talents ("it is not just hustling, what are you going to contribute to yourself? You are in artistry [PH], you cannot shoot... you cannot shoot, brother.").

JORDANI:	You know what I mean? You can end up in jail for anything, it is not only for shooting, you can even end up in jail for slapping your woman. You know what I mean? You smack some dude, and you got on top of him, and you hit him. You [STAMMERS] can go to jail for that. Now, when you get there, the guys are going to be waiting for you out-front. Take these—these two (2) socks, take these three (3) underwear, grab this, grab that, look there's soup, look there's salad.
DIAZ LIRANZO:	Bro, when I went in, the guys welcomed me. Listen, from what I got, I gave funds to the guys, bro...
	[VOICES OVERLAP]
GROUP:	[U/I]
JORDANI:	That's gangsta.
DIAZ LIRANZO:	That's so you could see bro, that only God knows bro, if you are nice, they are going to treat you nice.
JORDANI:	But he created that, sending from here... There're people here bro, that will easily fall and tell him, "Bro, you wouldn't even pick up the phone, brother... Why are you coming over here with that..."
	[VOICES OVERLAP]
JEFFREY SANTANA:	Bro, but next thing you know—next thing you know you bring them, "You know Sosa?" "Of course. Who doesn't know Sosa, bro?"
JORDANI:	When this dude fell, Lapiz (Pencil) [PH], that's over there...
	[VOICES OVERLAP]
JEFFREY SANTANA:	Everybody, bro. Everybody, bro.

JORDANI:	Even [I/I] were crazy with this dude. Because this dude used to send funds to everybody. When he fell, how he fell?
GROUP:	Of course.
JORDANI:	In a resort. That's what I want you guys to understand, it is not just hustling, what are you going to contribute to yourself? You are in artistry [PH], you cannot shoot... you cannot shoot, brother. Because you are in artistry. Then, that's a future that is going to be lost.
JEFFREY SANTANA:	Facts...
JORDANI:	Your duty is to be on top of your music. You want to be a singer, you start writing. What's up, a studio? What's up, a studio. The quota can be good for a studio.
UM:	Of course.
JEFFREY SANTANA:	A barbershop.
JORDANI:	Somebody wants to become a barber; a little group can have a barbershop. But that's for your own people bro, we are not giving anything away to nobody.
JEFFREY SANTANA:	Bro, there's a bunch of people making...
	[VOICES OVERLAP]
JEFFREY SANTANA:	I'm telling you bro...
GROUP:	[EVERYONE TALKING AT ONCE]
	[VOICES OVERLAP]
JEFFREY SANTANA:	And what does the trucker say? You are the one that's going to bring us the Zaza from New York because you're going to have your truck, bro.
GROUP:	[EVERYONE TALKING AT ONCE]
JEFFREY SANTANA:	[STAMMERS] When Sosa calls him, "This is in New Jersey. Bring ten (10) pounds over here." He's going to have to come down here because [U/I] CDL. They won't stop him, bro.
UM2:	It's true.
GROUP:	They can pull him over...
JEFFREY SANTANA:	They can pull him over, but he's going to have a truck, bro. He's going to have a truck with a company of ours.
UM2:	If he's not in line, he can be pulled over...
GROUP:	[EVERYONE TALKING AT ONCE]
JEFFREY SANTANA:	I mean, but he's going to have his truck. He's going to have his truck that will facilitate things over here. You know what I mean? That's what I'm saying, bro. Communication is everything because we are all going to

	communicate with each other, bro. Here we are going to talk about everything. We are all going to be on the same page. The one that can't hustle like I said—I work.
GROUP:	[EVERYONE TALKING AT ONCE]
JEFFREY SANTANA:	Tomorrow I go in at six (6:00) ... I go in at six (6:00) and come out at three (3:00). Besides that, I hustle, "U-u-u." When I go hustle, I call so and so, "I need this much..." I move, I move, bro.
UM2:	[U/I]
JEFFREY SANTANA:	Of course.
GROUP:	[LAUGHER]
JEFFREY SANTANA:	But that's what I'm saying bro...
GROUP:	[EVERYONE TALKING AT ONCE]
JEFFREY SANTANA:	We trust each other, if you need something don't be checking prices, you have it.
	[VOICES OVERLAP]
GROUP:	[EVERYONE TALKING AT ONCE]
JORDANI:	That's another thing, that's another thing. We have to have a close circle, bro. Here everybody makes moves of everything... Whatever you need, if it is working with cards, telephones, whatever you want to work here. Bro, if you know the play is here... why would you give money to somebody else?
JEFFREY SANTANA:	Call us.
JORDANI:	[STAMMERS] When all the money can stay here. We have to do that, bro. That needs to end. The money needs to stay here, bro. You cannot be jealous, bro, that Chiquito is making a lot of money because of you, bro. You need to feel proud that you're giving him money, bro, and that he's getting something, and that he's growing. Because at the end, it is going to be beneficial for you because one day, you're going to be with him, he's going to tell you, "Let's go over here." And he's going to pay... as it should, bro. Then, let's get together, bro. STAMMERS] Let's use our minds. Let's get to it, let's get to it. It is for us to grow, bro, Grow, grow... "You're not doing anything? What are you going to do? I'm going to give you fifteen (15) days so you can do something for me." "No, is that I—uh... I don't know, I feel like garbage." So, then leave...

370. The group then discusses the quote being \$30, and the group agrees to that amount being paid on Fridays. The quota will be \$20 for the gang operations, and \$10 for those in prison. JORDANI also collects \$50 from everyone present and notes that there are 20 Trinitarios in

attendance, which results in \$1,000 being in the fundo ("We are twenty (20); it is a thousand (1,000) bucks.").

JORDANI:	Okay, because you all are going around too much, and I am tired.
GROUP:	[EVERYONE TALKING AT ONCE]
JORDANI:	Uh... Do you all agree to the thirty (30) bucks?
GROUP:	Yes, yes, yes...
JORDANI:	Are you sure?
GROUP:	[EVERYONE TALKING AT ONCE]
JORDANI:	Do not miss it on Fridays.
JEFFREY SANTANA:	Friday to Sunday, Friday to Sunday...
JORDANI:	Usually everybody gets pay on Fridays.
UM2:	[U/I] probably those thirty (30) ...
	[VOICES OVERLAP]
GROUP:	[LAUGTHER] [EVERYONE TALKING AT ONCE]
JEFFREY SANTANA:	From Friday to Sunday. The ones from here already do it.
HULK:	You know when you are inside you pay double for everything. So, twenty (20) bucks supposedly each, is very little also for the guys that are on the inside.
JORDANI:	No, hold up...
JEFFREY SANTANA:	It is twenty (20) for the quota and ten (10) for the prisoners.
HULK:	No, but I'm telling you if they raise the quota... honestly is better because that way we [U/I] also... Thirty (30) is fine.
	[VOICES OVERLAP]
JORDANI:	Wait, what's today's date?
HULK:	The first.
JORDANI:	December first, the first...
HULK:	December first.
JORDANI:	And this is only the beginning. The quota is going to end up being fifty (\$50) dollars. That's because today [U/I] ...
	[VOICES OVERLAP]

HULK:	Gradually, gradually...
JORDANI:	... thirty (30).
HULK:	Alright.
JORDANI:	At a determined time, it is going to go up to forty (40). At a determined time, it is going to increase to fifty (50). Where the guys—what hurts the guys, their pockets. Everybody is going to show their faces, bro. Once you see supposedly fifty (50) bucks. It is not a lot, but it is a hole...
	[VOCIES OVERLAP]
GROUP:	[LAUGHER] [EVERYONE TALKING AT ONCE]
JORDANI:	[STAMMERS] it is a full tank of gas. You could last a (1) week with the tank filled; it is fifty (50). That's when you're going to see the true faces of the guys, the sacrifice.
JEFFREY SANTANA:	Now Chiquito is going to stop smoking.
JORDANI:	You feel me? The sacrifice.
GROUP:	The sacrifice, uh-huh...
JORDANI:	And the privilege of you being here. It is fifty (50), bro.
JEFFREY SANTANA:	[U/I]
GROUP:	It is true...
JORDANI:	But bro, you are telling me it is fifty (50), there are ten (10) guys. How much is fifty (50) times ten (10)?
HULK:	Five hundred (500).
JORDANI:	You feel me? We are twenty (20); it is a thousand (1,000) bucks.
UM2:	Extra money...
JORDANI:	How much is it in a week, a thousand (1,000) bucks. It is four thousand (4,000) a month... do the math for twelve (12) months. Bro, there's no way. It is [STAMMERS] sixty (60) to fifty thousand (50,000) bucks a month.
JEFFREY SANTANA:	The lawyer is leaving, hold on...
JORDANI:	But that is... it is for a purpose, bro. Don't think that the money, that the money supposedly, that the money is supposedly going to be up in the air. It is something... it is something bro, that is going to be there. But also, if one day you need three hundred (300) for the rent, you have—you have something around that you could use. But you need to understand that it is borrow. It is not an inheritance either. It is borrowed. You took three hundred (300), you take a month to pay for it, you do the math of thirty (30) bucks. How much is it? Three (3) times how much is it; three (3) times four

	(4), it is one hundred and twenty (120). [U/I]. You took three hundred (300), you have to give me four twenty (420).
JEFFREY SANTANA:	As it should...
JORDANI:	Back in a (1) month.
JEFFREY SANTANA:	The lawyer.
UM2:	Damn...
GROUP:	[EVERYONE TALKING AT ONCE]
JORDANI:	You know what I mean? Now, you gave it to me right away; you don't have to give me anything. But you have to give me, even if it is ten (10) bucks more.
JEFFREY SANTANA:	Uh, excuse me, excuse me...
HULK:	For the candy [PH] and shit.
GROUP:	[EVERYONE TALKING AT ONCE]
	[VOICES OVERLAP]

371. JORDANI then instructs SOPITA to write down all of the Trinitarios present, and SOPITA notes them and indicates whether they have paid or not.

JORDANI:	Sopita, take everyone's name as well, that are here.
JEFFREY SANTANA:	I already have them written down, bro.
JORDANI:	There are people missing here. I bet you're missing people.
JEFFREY SANTANA:	Not here.
UM2:	No, he has them written down. He has them written down.
JORDANI:	And how many people are here now?
JEFFREY SANTANA:	I know that everybody here is written down. [LAUGHS]
JORDANI:	Write it down because the budget...
JEFFREY SANTANA:	They are written down...
UM2:	[U/I] add the number on the side.
JEFFREY SANTANA:	Yeah, I'm going to put the number.

JORDANI:	Yeah, you have to put their number, because that also depends on the...
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372. JORDANI then states they will address the issues with the Lynn rivalries. JORDANI believes the rivalries stem from sexual relations with the women of rival gang members and murders of their relations. JORDANI then states that the rivalries are also why they need money in the fundo. JORDANI states that “if we don’t have money, we can’t start a war.” JORDANI reiterates that the chain of command will involve JEFFREY SANTANA getting word from anyone who is involved in violence against a rival.

JORDANI:	What’s Lynn’s hate? That the women from Lynn can’t talk shit because all have shot their brothers, their cousins, their guys. Also, boom-boom-boom [ONOMATOPOEIA]. They started to make comments about a couple of guys that are in jail and all the guys on the contrary, they would tell them all the contrary, “he fucked you; he fucked you.” They killed some girl’s brother, they are blaming one of the guys, “But he fucked you. The one that killed your brother used to fuck you...” You know what I mean? None of them can say anything, no women. And the guys, all the women they have, you already know. [U/I] ass...
GROUP:	[LAUGTHER]
JORDANI:	Then, what is it that we need, bro? It is money, bro. Then if we don’t have money, we can’t start a war. I don’t want anybody here talking about [STAMMERS] fights. That’s why Sopita must call me. The first one to call me that supposedly is going to deal with some people, that is going to shoot somebody...
JEFFREY SANTANA:	Kill yourself.
JORDANI:	“Listen, we have a problem...” That doesn’t, that doesn’t matter. Money brings problems, and that’s what we need right now, money bro.
JEFFREY SANTANA:	Before bro, when we used to get stopped... “You green guy? You popote [PH]?” I know what I am. I am not bringing you down bro...
JORDANI:	That’s it, bro...
JEFFREY SANTANA:	I know what I am. But when time comes I am not going to be a pussy [PH]. “Boom!” I stopped you. “That’s it, bro, look, I punched him because he was going to hit me. Let me leave because he disrespected me.” But also, don’t be a pussy. “Oh bro, I’m not in any troubles.” You leave and that’s it, normal. And after I’ll tell Sosa, “Let’s go grab that guy, let’s jump him.” That’s it, bro.

JORDANI:	“You are a Trinitario?” What I am is Dominican.” Why? Don’t you know that a Dominican is fifty (50%) percent Trinitario, because we fight for the Homeland, not for a gang...
GROUP:	[EVERYONE TALKING AT ONCE]
JEFFREY SANTANA:	Fort he Homeland...
JORDANI:	We fight for the Homeland and not for a gang. We fight for a nation that is Dominican Republic. Being Dominican, that’s why we fight. A Dominica, an abuse, he is not Trinitario, you have to get involved. You called me, “Look, they were beating up a guy, I got involved.” “Bro are you good?” “What’s up? A couple of guys showed up, they made a fuss.” They guys arrived. “What’s up?” Zoom [ONOMATOPOEIA]. Even if you don’t know that guy. Our papers say it, bro. This was done against a Dominican. But when are you going to grab a gun...
GROUP:	[EVERYONE TALKING AT ONCE]

373. JORDANI then queries the membership about the quota and new rules. All of the members agree to contribute to it.

JEFFREY SANTANA:	But everybody knows that.
JORDANI:	How are you going to grab this one? He is Dominican, you don’t know him... Sopita, do your thing, and you’re going to shoot him knowing that he is Dominican. You can’t do that, bro.
GROUP:	[EVERYONE TALKING AT ONCE]
JORDANI:	You know what I mean?
JEFFREY SANTANA:	But are we on the same page?
GROUP:	Yes.
JEFFREY SANTANA:	Do you all agree with the quota?
GROUP:	Yes
JEFFREY SANTANA:	Do you all agree with the quota?
GROUP:	Yes.
JEFFREY SANTANA:	Do you all agree with the quota?
GROUP:	Yes.
JEFFREY SANTANA:	You heard, right?

UM:	But wait, hey, hey, let me ask you a question, because I was behind. Are you going to get me up to date with the thing yes or not?
GROUP:	[LAUGTHER]

374. Another member then asks if there will be a Trinitario group chat created. JORDANI agrees that there will be a chat created, but that they will need to use codes and not be explicit over the phone (“The group chat on social media? Yes, yes. We have to work on that because... if, if we are talking about communication, we have to be full. But there we are going to talk even with mail and code”; “If somebody wants something coded, “Such and such let’s get together.” “Such and such I need you.” “Such and such this.” “What’s up? Let’s do a get together.”).

UM3:	What’s up? Is the group chat going to be open again?
JORDANI:	What is it?
UM3:	Are we going to do the group chat again?
JORDANI:	The group chat on social media? Yes, yes. We have to work on that because... if, if we are talking about communication, we have to be full. But there we are going to talk even with mail and code.
UM3:	Okay.
JORDANI:	If somebody wants something coded, “Such and such let’s get together.” “Such and such I need you.” “Such and such this.” “What’s up? Let’s do a get together.” Don’t talk about nothing [STAMMERS] eleven (11), [BACKGROUND: VOICES] about the meeting, none of that. “Bro, let’s get together to drink a bottle of rum.” “Bro, let’s smoke.” And there you talk in person. Try to use social media as little as possible.
	[VOICES OVERLAP]
GROUP:	[EVERYONE TALKING AT ONCE]
UM2:	Don’t talk on social media...
UM:	Of course.
JORDANI:	Try to use as little as possible other people’s Wi-Fi.
UM:	[LAUGHS]
JORDANI:	Yeah, stealing Wi-Fi gets you tangled up. Stealing Wi-Fi...

GROUP:	[EVERYONE TALKING AT ONCE]
UM4:	No, no, I'm also going to tell you something. If we make a group—do you remember how the guys were before?
JORDANI:	Yes, yes, yes... for them to pay attention, for the women to not be listening to shit. There're only men here, there's no women here.

375. JORDANI then discusses the proper way to handle internal issues of disrespect with an emphasis on communication. JORDANI then, again, reiterates that the quota is mandatory and cannot be missed ("? Because right now the most important is that we need all your help bro, with the quota. It is mandatory. It can't be missed, bro."). JORDANI emphasizes that the money will be used to fund violence against the rivals and relocate those who commit violence ("Because us without any money and start a war, we are going to lose it... we'll lose it because we don't have for bullets, we don't have to buy guns... anybody that starts a shooting has to leave to another state. Where are we going to go? We have to put them in a hotel for at least five (5) days and there's no money, what are we going to do? Put them in a car, in a hotel's parking lot? We can't do that; you know what I mean?").

JORDANI:	I hope that you feel comfortable in talking with any of the guys, "Such and such, look." Because there's also a lot of people here that don't know a lot of things, you get close to them, "Such and such, you have more experience than... what's up?" You know what I mean? We are also going to teach here too. Nobody here is going to supposedly be an orphan. Here we are going to teach to... we have some papers to study. Because this is not unorganized.
JEFFREY SANTANA:	Exactly.
JORDANI:	You know what I mean? We have our papers, our shit, work on the respect. Once you lose respect, you lose everything. Try to work on respect as much as possible. If you feel some type of way with this one, that he disrespected you. Get your head- get somebody that's above of you, tell them, "My bro, look, on such day you disrespected me, I want to talk to you so you can be a witness, I didn't feel comfortable." And there you talk, dialogue, but he's there not to give an opinion, he's there as a witness.
UM2:	As a referee.
UM3:	As a witness.

JORDANI:	Witness that the mission was done, witness that, if it happens again in the future, and you feel some type of way with this dude, you tell him, "It was the same the last time, my bro. I pulled you and told you." You know what I mean? Then, is true, and it's going to happen again, you did the same again... You know what I mean? Try to communicate more. Be more together. "Such and such, what's up? Do you need something, my bro, did you eat?" What's up? You know that such and such isn't working, you can call him. "What's up, my bro? Do you have your quota? Take these thirty (30), put yours, but next week you can put mine because I put yours." You know what I mean? Because right now the most important is that we need all your help bro, with the quota. It is mandatory. It can't be missed, bro. Because us without any money and start a war, we are going to lose it... we'll lose it because we don't have for bullets, we don't have to buy guns... anybody that starts a shooting has to leave to another state. Where are we going to go? We have to put them in a hotel for at least five (5) days and there's no money, what are we going to do? Put them in a car, in a hotel's parking lot? We can't do that; you know what I mean? Then, now we have to stop getting in trouble. Now what we have to focus on is on saving money for the family, for money. This is going to go up. But my bro, don't feel uncomfortable if for example... I gather fifty thousand (50,000) ... you know what, if I gather ten thousand (10,000) bucks, you know what I mean? And I open a spot, we can set up a food spot, just the same way we can set up a barbershop. We set a budget; we can also set up something with cars. [U/I]. Weren't you that said? Aren't you the one doing that?
UM3:	But he retired, it is cold, man...
JORDANI:	But you saw that he talked about washing cars for five (5) bucks.
GROUP:	[LAUGHTER]

VII. OTHER RACKETEERING ACTIVITY

A. DRUG IMPORTATION AND DISTRIBUTION

376. Multiple cooperating witnesses have provided information concerning the ongoing efforts of the Trinitarios to traffic in large quantities of controlled substances, including fentanyl and cocaine, and counterfeit prescription pills containing fentanyl and methamphetamine. In particular, at least four cooperating witnesses have described obtaining large quantities of drugs from PAULA-CABRAL, JANOV BATISTA, JORDANI and SANTOS. PAULA-CABRAL, JANOV BATISTA, JORDANI and SANTOS and other leaders are believed to supply controlled

substances to the Trinitarios, and they in turn obtain the controlled substances through various means, including large quantities of drugs being sent by mail and common carrier from the Dominican Republic, and traditional vehicular transportation through international drug cartel associates.

377. In short, the investigation has revealed that the Trinitarios obtain significant quantities of controlled substances and then distribute those drugs in Massachusetts, New Hampshire and Maine. From review of cellular devices, I know that senior Trinitarios, such as WARLY RUIZ, TOMY SANCHEZ, SANTOS, GARCIA VASQUEZ and JORDANI, employ junior Trinitario members and probationary members to transport and handle drugs that they have received from PAULA-CABRAL, SANTOS and JANOV BATISTA. Lower-level Trinitarios who are employed as dealers and transporters include, ABEL SEVERINO REYES, DARWIN BATISTA, and DAVID GARCIA.

378. The Trinitarios transport the drugs to Maine and operate distribution networks out of trap houses. These trap houses are obtained through agreements with local Maine and New Hampshire residents who permit the Trinitarios to use their residences as bases of operations in exchange for drugs. Using these remote bases of operation to store drugs and sleep, the Trinitarios bring large quantities of controlled substances up to Maine and prepare them for distribution.

379. Once the drugs are in Maine and adulterated by adding cutting agents, the Trinitarios distribute the drugs to local Maine-based dealers and dealer-users, often engaging in sales on consignment. This consignment arrangement works as follows: the dealer receives a quantity of controlled substances from the Trinitario gang members without payment; the dealer then sells the controlled substances to their customer base; and the dealer provides payment to the Trinitario source after the drugs are sold. Once the consignment debt is paid, the Maine-based

dealer then can be resupplied on a consignment basis again. The Trinitarios focus their sales of controlled substances in Maine due to the higher prices that can be obtained. Higher prices exist in Maine for controlled substances due to a steady demand, coupled with the lack of a consistent supply and inconsistent quality.

i. 12/3/2020, SEIZURE OF TWO KILOGRAMS OF COCAINE

380. On December 3, 2020, Lynn Police Department was contacted by the US Postal Inspection Service regarding certain packages that were set for delivery to known gang affiliated addresses in Lynn. Based on experience and drug trafficking intelligence in an ongoing investigation, these packages to contain illegal controlled substances and/or the proceeds from drug sales. The packages in question were sent from an address located in Puerto Rico and addressed to several individuals including SANTOS. Officers determined that the packages would be delivered around noon that day to two separate addresses in Lynn.

381. Lynn Police officers conducted surveillance near the area that the packages were believed to be delivered to at approximately 11:45 AM on December 3, 2020. Once the packages were delivered, officers observed a female retrieving the packages and coordinating with SANTOS. Officers also observed SANTOS and another man retrieving one of the packages from the second location.

382. Upon speaking with the female, she stated that ANGEL SANTOS had requested the packages be delivered to her house as part of "a game." Both SANTOS and the known Trinitario member refused to answer questions about the packages seized. The package in possession of the female and the package retrieved by SANTOS were seized from vehicles. Both packages were seized and thereafter transported to the police station where K-9 units alerted to the odor of narcotics. Following the issuance of a search warrant, each package was found to contain

one (1) kilogram of cocaine. On or about February 5, 2025, the two kilograms were field-tested and determined to contain cocaine.

ii. 6/2023, DISCUSSION REGARDING DRUG TRAFFICKING

383. As part of the investigation, investigators reviewed a text message and audio message conversation between SANTOS and JORDANI taking place in June 2023, over the encrypted Signal Application. In the conversation, SANTOS and JORDANI coordinate the Trinitarios drug manufacturing and distribution activities.

384. For example, on June 12, 2023, SANTOS sent JORDANI video (IMG_1312.mp4) depicting a brick of white powder that appears to be cocaine or fentanyl. The brick appears to be consistent in size and consistency with a kilogram quantity. The brick is wrapped in black and clear plastic that has been cut open to expose the drugs inside. The white brick appears to have a “stamp” on it that I know to be used by drug traffickers to identify a particular brand or source. The video then zooms in on the brick and shows the shiny nature of the substance, which is consistent with what is described as “fish scale” look that signifies high purity. The metadata from this video file is consistent with it having been filmed by SANTOS on his device. Still images from that video follow:



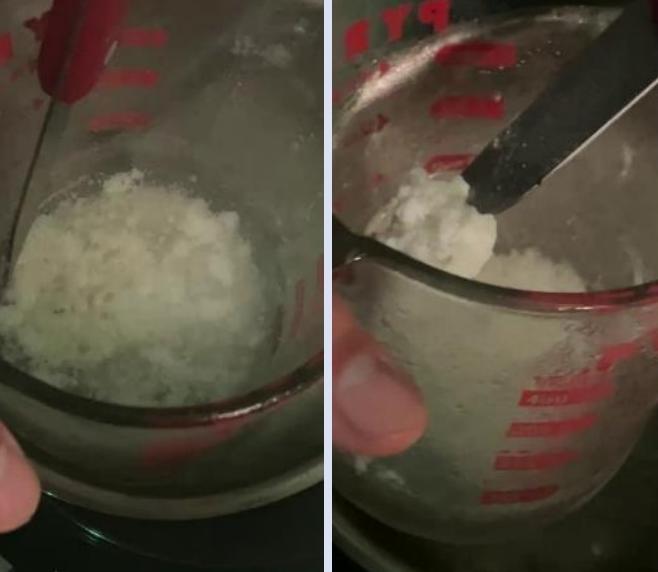
385. On June 13, 2023, shortly after the video was sent by SANTOS, SANTOS and JORDANI discuss prices and future drug shipments. SANTOS tells JORDANI that their supplier can get a cheap price, but they are paying at the cost of the kilogram. SANTOS states that he intends to move the drugs fast and see what price he can obtain when the supplier's next shipment comes in ("nah what I want to do is move that quick because what he wants to do is test give me work to see how fast we can move it, when the next shipment comes in heavy and that when it gets interesting").

AUTHOR	CONTENT – PRELINARILY TRANSLATED	DATE - TIME
SANTOS	No, when its for them they pay it cheap but it's for you you have to pay at the cost of the Kilo.	6/13/2023 1:32:43 AM(UTC+0)

SANTOS	But nah what I want to do is move that quick because what he wants to do is test give me work to see how fast we can move it, when the next shipment comes in heavy and that when it gets interesting.	6/13/2023 1:33:03 AM(UTC+0)
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386. In one portion of the conversation taking place on June 14, 2023, SANTOS sends JORDANI a 5 minute and 30 second video of crack cocaine being cooked in a glass container located in a pot with boiling water (signal-2023-06-14-012705.mp4). JORDANI responds asking if they are putting the “egg” and SANTOS responds that he has the crack cocaine “drying right now” and that he is “going to show” JORDANI a video of the process. It appears that JORDANI intends to forward the video of the cooked crack to another individual. SANTOS then says, “No, don’t send that one” referring to the video, and states he will make a batch of crack cocaine that is higher quality (“I am going to do one better or cooler”). SANTOS then sends a video of multiple batches of crack cocaine being cooked. SANTOS then states, “Tell those people to learn to cook” and that they will be using more baking soda (“they put more baking soda that works”). JORDANI responds, stating that they will find out about the quality from the customers the next day (“Don’t hurry because tomorrow we will find out what they say”). SANTOS responds and offers to cook the crack in front of the customers in order to show them the quality (“Tell them if they want someone to cook it in front of them”, “to show a little of what this is”). JORDAN responds that he will send them the video, and that he is waiting for El Viejo, referring to JANOVY BATISTA to message him (“No I am going to send them the video I am waiting for the old man to write to me.”). This portion of the conversation follows with the preliminary translation and still images from the video files.

AUTHOR	CONTENT - PRELIMINARY TRANSLATION	DATE / TIME
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SANTOS		6/14/2023 5:27:05 AM(UTC+0)
JORDANI	are they putting the egg?	6/14/2023 5:35:15 AM(UTC+0)
SANTOS	Brother, I have that drying right now.	6/14/2023 5:35:35 AM(UTC+0)
SANTOS	I am going to show you	6/14/2023 5:35:38 AM(UTC+0)
SANTOS	Ok.	6/14/2023 5:35:40 AM(UTC+0)
JORDANI	alright, I am going to send it.	6/14/2023 5:35:57 AM(UTC+0)
SANTOS		6/14/2023 5:36:05 AM(UTC+0)
SANTOS	Don't send that one	6/14/2023 5:36:13 AM(UTC+0)
SANTOS	I am going to do one better or cooler.	6/14/2023 5:36:21 AM(UTC+0)
JORDANI	ok	6/14/2023 5:36:34 AM(UTC+0)

SANTOS		6/14/2023 5:40:49 AM(UTC+0)
SANTOS	Tell those people to learn to cook.	6/14/2023 5:41:03 AM(UTC+0)
SANTOS	cook	6/14/2023 5:41:06 AM(UTC+0)
SANTOS	they put more baking soda that works	6/14/2023 5:41:24 AM(UTC+0)
JORDANI	Hahaha its "mmg"	6/14/2023 5:49:37 AM(UTC+0)
SANTOS		6/14/2023 5:50:50 AM(UTC+0)
SANTOS	They are rookies.	6/14/2023 5:50:58 AM(UTC+0)
JORDANI	Don't hurry because tomorrow we will find out what they say	6/14/2023 6:31:06 AM(UTC+0)
SANTOS	Tell them if they want someone to cook it in front of them.	6/14/2023 6:42:08 AM(UTC+0)
SANTOS	to show a little of what this is.	6/14/2023 6:42:19 AM(UTC+0)
JORDANI	No I am going to send them the video I am waiting for the old man to write to me.	6/14/2023 2:11:07 PM(UTC+0)

387. On June 15, 2023, JORDANI tells SANTOS that one of their associates will go “down” to pick up “3”, but advises SANTOS to do the transportation early because the city is hot (“the “crazy” guy is going down to pick up the 3, but wake up early before 11 to do it tomorrow because the city is hot”). SANTOS then responds that he can take the “800” at one location, and

that he has cash in his currently is, and that he does not want the cash in the same location as the 800 – based on the context I believe that 800 is a reference to grams (“Whats up, I can take the 800 there. I have money here that I don't want together.”). JORDANI then instructs SANTOS to bring the 800 with a scale so that when JORDNAI goes to meet with the customers, he can weigh it front of them – he does not have a big enough scale at the moment (“Bring it with everything and the scale. Bring it with everything and the scale. When I go tomorrow and they come and get whatever they get, I can weigh right there. I do not have a big scale or anything like that.”).

AUTHOR	CONTENT - PRELIMINARY TRANSLATION	DATE - TIME
JORDANI	the "crazy" guy is going down to pick up the 3, but wake up early before 11 to do it tomorrow because the city is hot. That's another thing that we have to control if we want to work calmly, we have to sit and talk in depth to see what will do for money to control that thing.	6/15/2023 1:24:01 AM(UTC+0)
SANTOS	What's up	6/15/2023 2:46:40 AM(UTC+0)
JORDANI	What's up	6/15/2023 2:47:47 AM(UTC+0)
SANTOS	Whats up, I can take the 800 there. I have money here that I don't want together.	6/15/2023 2:48:51 AM(UTC+0)
JORDANI	ok	6/15/2023 2:49:11 AM(UTC+0)
JORDANI		6/15/2023 2:49:15 AM(UTC+0)
JORDANI	Bring it with everything and the scale. Bring it with everything and the scale. When I go tomorrow and they come and get whatever they get, I can weigh right there. I do not have a big scale or anything like that.	6/15/2023 2:49:35 AM(UTC+0)

388. Another part of the conversation takes place on or about June 16 and 17, 2023, through audio messages. JORDANI explains that he was going to have extra money for SANTOS (“I was going to surprise you with 2k there, I was going to gift it to you”), but the white guy he was providing the drugs to would not accept them based on the color signifying a low quality (“But the gringo says no he didn't like it, the color and stuff.”). JORDANI explains that they need to ensure the drugs are not low quality because people have been complaining (“check it well, bro, that is not opaque because people are complaining that it is opaque and a little yellowish”). JORDANI explains that their customers are “spoiled” – they buy large quantities, but they want a

pure product so that they can add cutting agents to make more drugs themselves (“it’s that these people are spoiled, they are spoiled, but they buy a lot but they are spoiled but I know what they want. Because they want they something that has zero miles so they can add their own”). SANTOS then tells JORDANI that he spoke with JANOVY BATISTA (his step-father), and that JANOVY BATISTA told SANTOS to find a stamp they can use in making their own kilogram bricks (“I was talking to my step-father, he was telling me. If you can find out how to get a stamp for us to put on a Key). SANTOS suggests they can use 100 grams of raw cocaine or fentanyl and cut it with cutting agents, so that they can make and form their own kilograms that they will sell for \$4,000 per kilogram (“100 grams, separate and to put an original stamp we will become millionaires, we will charge 4,000 for each key.”). SANTOS further explains that JANOVY BATISTA does not know how to make his own kilograms because he receives the kilograms directly from the supplier, but does not adulterate them before selling them – he receives them “direct” from the supplier and he moves it (“He does not have the way to do because he doesn’t know about that or the Mexican stuff. They give it to him direct. The transport doesn’t go by, it touches him and he moves it.”). JORDANI responds that he has all that they need or can get it, including a kilogram press and a stamp (“Compadre, I have all of that, I can get it, the press and all and the stamp”).

AUTHOR	CONTENT (PRELIMINARILY TRANSLATED)	DATE / TIME
SANTOS	Hey tell them people to give you an hour, that you will have that thing ready in hand in an hour.	6/17/2023 1:54:52 AM(UTC+0)
JORDANI	Compadre, he took and everything. I went and sent some people in front with that and I gave him 2 or 3 dollars, and now I have to pay the crazy guy without working and me not making anything but that guy I use him 24-7. I was going to surprise you with 2k there, I was going to gift it to you. But the gringo says no he didn’t like it, the color and stuff. But let me know if it’s complete. But check it well, bro, that is not opaque because people are complaining that it is opaque and a little yellowish. I have not seen anything like that but the person who is buying is always looking for something in the thing.	6/17/2023 1:56:56 AM(UTC+0)

SANTOS	That's it, because 100 came and went, desperate for real for real and that's easy.	6/17/2023 2:01:33 AM(UTC+0)
JORDANI	its that compadre, it's that these people are spoiled, they are spoiled, but they buy a lot but they are spoiled but I know what they want. Because they want they something that has zero miles so they can add theres. But, dam.	6/17/2023 2:05:12 AM(UTC+0)
JORDANI	Let me know, let me know about that so you can bring it down to me, I can take it at once. These guys are more... these guys are really tough, the one that called me for one, I know that he wants to try.	6/17/2023 2:05:36 AM(UTC+0)
SANTOS	No brother that is not blocked, for real for real I was talking to my step-father, he was telling me. If you can find out how to get a stamp for us to put on a Key. 100 grams, separate and to put an original stamp we will become millionaires, we will charge 4,000 for each key. Do you understand? He does not have the way to do because he doesn't know about that or the Mexican stuff. They give it to him direct. The transport doesn't go by, it touches him and he moves it.	6/17/2023 2:14:38 AM(UTC+0)
JORDANI	Compadre, I have all of that, I can get it, the press and all and the stamp, what's up?	6/17/2023 2:19:29 AM(UTC+0)

iii. 8/1/2023, PAULA-CABRAL DISCUSSION WITH “NAPOLI”

389. Investigators reviewed a text and audio message conversation between PAULA-CABRAL and an individual identified by PAULA-CABRAL as “Napoli” taking place over the Signal application. A cooperating witness has described Napoli as a source of supply for controlled substances that were being obtained by PAULA-CABRAL, TOMY SANCHEZ, and SANTOS, who would then pass the controlled substances onto lower-level Trinitarios for distribution. At various points in the conversation, they discuss payment, deliveries, and arrests of Trinitarios.

390. During one part of the conversation, PAULA-CABRAL and Napoli discuss PAULA-CABRAL’s difficulties running the Trinitarios organization. PAULA-CABRAL explains that JEFFREY SANTANA got into an altercation in Boston with a rival gang member (“Sopita did something stupid in Boston with the thugs, for nothing, over music, you understand. Then, he... he knows what we are going to do to that kid, and he started talking to the kid over the phone.”). PAULA-CABRAL then explains that the leader of the Boston Chapter got arrested in Lawrence (“The one that got the first in Boston, he got arrested in Lawrence, dude”).

Enmanuel Paula 29d2f8cb-beab- 450c-8ae9- 376be9e40a60.opus 8/1/2023 3:41:35 PM	It's like I'm telling you, bro, here... look, I just got back, and Sopita... [STAMMERS] the day that I was leaving, Sopita did something stupid in Boston with the thugs, for nothing, over music, you understand. Then, he... he knows what we are going to do to that kid, and he started talking to the kid over the phone. I told him, "Bro, you need to have a set of balls to handle what's coming back to you, because you are very stupid. He didn't say anything, you know. The thugs did a bunch of silliness. The one that got the first in Boston, he got arrested in Lawrence, dude. Then, he got arrested again and now they gave him a bail of thirty five (35); when they went to pay the bail, the bail was denied. So, over here the thugs are doing wrong; the thugs are doing a bunch of silliness, dude; a bunch of silliness and more; what I'm trying is to stay away, that way I don't... I'm not part of it, bro.
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391. The conversation continues with PAULA-CABRAL stating that he tried to build an empire with the Trinitarios and was buying drugs for a low price and then giving it to the Trinitarios for a very cheap price ("Dude listen, I tried hard to build an empire here, dude. I tried. Dude, I started getting work for the low. You know, that was [STAMMERS] during the pandemic, I was getting from the bottom. I was giving it to the thugs at a price, dude, dirty cheap"). PAULA-CABRAL even had a few members selling pills for him ("the buttons too; I had a few thugs making their money with the buttons"). PAULA-CABRAL then describes how other Trinitarios were making money from unemployment scams, and credit card scams, and he was helping them ("The thugs were also making their money with unemployment. The thugs were working with the stuff of the, of the credit cards; I was helping them, you understand. I had them hustling, dude."). PAULA-CABRAL recalls that this was a profitable time for the Trinitarios and they travelled to Miami, rented AirBnBs, and they had money to make purchases ("we all went to Miami. Dude, we... meaning, we were making it happened really good, dude, all of us, dude. All the thugs", "all the thugs we were making it happened really good; all the thugs dude, we were making it happened really good. If we were going to do something, we were like, "What's up? Let's rent an air bnb. Let's do something nice in New Hampshire." Boom, we would rent something without thinking

about it.”). PAULA-CABRAL laments that the Trinitarios are now broke again, and he cannot continue to babysit them in terms of making money (“those thugs are broke again, bro. To be honest, it’s unfortunate, but I learned, bro that I could do a lot of things bro, but I can’t be anybody’s dad; I cannot be babysitting anyone”).

Enmanuel Paula 98327014-68b1- 44b9-88a1- e9ed6477ec0e.opus 8/1/2023 4:16:37 PM	<p>Dude listen, I tried hard to build an empire here, dude. I tried. Dude, I started getting work from up there. You know, that was [STAMMERS] during the pandemic, I was getting for the low. I was giving it to the thugs for at a price, dude, dirty cheap, uh... the buttons too; I had a few thugs making their money with the buttons. The thugs were also making their money with unemployment. The thugs were working with the stuff of the, of the credit cards; I was helping them, you understand. I had them hustling, dude. They... at the end of the day the thugs just did stupidities, instead of continuing with what I had them do. Dude the thugs and I, we were... we all went to Miami. Dude, we... meaning, we were making it happened really good, dude, all of us, dude. All the thugs. There were some of us that were making more than others, of course, because that will always happen, but, all the thugs we were making it happened really good; all the thugs dude, we were making it happened really good. If we were going to do something, we were like, “What’s up? Let’s rent an air bnb. Let’s do something nice in New Hampshire.” Boom, we would rent something without thinking about it. So and so, you bring this, So and so, we have to give this amount to this one so he can get this, boom.” And we would make it happen. Everyone had a nice ride, bro, and those thugs are broke again, bro. To be honest, it’s unfortunate, but I learned, bro that I could do a lot of things bro, but I can’t be anybody’s dad; I cannot be babysitting anyone.</p>
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iv. 9/2023, 12/2023, VIDEOS OF DRUGS

392. During a search of LANTIGUA’s phone, investigators located a video depicting a large quantity of blue pills that appear to resemble Percocet 30mg (IMG_2124.mov). This video file appears to have been filmed on September 19, 2023, by LANTIGUA’s phone.



393. Investigators located another video in LANTIGUA's phone depicting an individual handling what appears to be two plastic-wrapped kilogram bricks of cocaine or fentanyl (IMG_2389.mov). This video appears to have been filmed by LANTIGUA's cellular phone on or about December 20, 2023. During the video, LANTIGUA's voice can be heard stating "You a little nigga, you heard." Still images from the video follow:



v. **9/2023, CONVERSATION BETWEEN SANTOS AND CC-10**

394. Investigators reviewed a text message and audio messages conversation between SANTOS and another Trinitario member I will refer to as CC-11. This conversation takes place over the Signal application. In the conversation, SANTOS and CC-11 discuss large quantities of drugs, the quality of the drugs, the logistics of transporting the drugs to Maine, payment for the drugs, and other Trinitarios dealers (such as WARLY RUIZ) and leaders and sources of supply (such as JORDANI and JANOY BATISTA).

395. At one point, CC-10 seems to ask for money, and SANTOS responds that there is no money, but he has large quantities of drugs (“work”) and that if CC-11 wants to get paid he can take the payment in drugs, or he can wait until SANTOS has sold the drugs and can provide cash

(“There's no money, what there is, is work, if you want it, you can take it in work, or if not, you're going to wait, you're going to have to wait until that is moved”). CC-11 then asks about who is going to guarantee the quality of the drugs, and states that he will return the drugs if the quality is not good (“who's going to guarantee me that work is good?”, “If that work is bad, I'm going to return it to them”). CC-11 then states that they are dealing in drugs and cash, not sweets and the other associate that SANTOS is dealing with has to be more responsible (“And then, this is drugs. If you're dealing with cash and drugs, you understand me? We're not dealing with sweets or anything like that.”). At the end of the selected portion of the conversation, SANTOS and CC-10 discuss an amount of drugs being given to CC-11 and WARLY RUIZ (“Wally”). SANTOS states the amounts being provided to CC-11 and RUIZ are the same (“Yours and Wally's is the same”) and that SANTOS was going to provide the drugs to RUIZ (“I was going to pass him that”). CC-11 objects to RUIZ holding his quantity of drugs, because he fears RUIZ losing it, and notes that the quantity is a “whole” thing likely referring to a kilogram for CC-11 and a kilogram for RUIZ (“that what's mine is mine. To let Wally lose from me, that what's mine is mine...UI...to give me my whole thing”).

AUTHOR	CONTENT PRELIMINARILY TRANSLATED	DATE - TIME
CC-11	Let me talk with Jordany	9/4/2023 12:50:11 AM(UTC+0)
SANTOS	What did you do with that	9/4/2023 4:42:52 AM(UTC+0)
SANTOS	What's up, what did you say to me	9/5/2023 4:34:08 PM(UTC+0)
CC-11	What's up	9/14/2023 4:24:02 AM(UTC+0)
SANTOS	What's up?, listen up...UI...right now, what's up?, what is it that you want? There's no money, what there is, is work, if you want it, you can take it in work, or if not, you're going to wait, you're going to have to wait until that is moved.	9/14/2023 4:29:08 AM(UTC+0)
CC-11	Ok, and who, who's going to guarantee me that work is good? Because I'm not a little boy either. If that work is bad, I'm going to return it to them. And then after I don't...I don't want them to not be picking up the phone, to not be supposedly for this and that, if that work is bad. You understand? Because there's no little boy here. And then, this is drugs. If you're dealing with cash and drugs, you understand me? We're not dealing with	9/14/2023 4:42:04 AM(UTC+0)

	sweets or anything like that. You understand what I'm telling you? And he has to be more responsible. Good.	
CC-11	Where are you all right now?	9/14/2023 4:42:18 AM(UTC+0)
SANTOS	I left from there, I'm going to Maine right now to take a cargo "durisimo", and for real, for real, the work is "durisimo" because that's what I'm moving right now and it's working for me.	9/14/2023 4:43:10 AM(UTC+0)
CC-11	Then whats up? Tell that "tiguere" that let's meet up right now so he can resolve me with that. But it's for today, not for tomorrow or past.	9/14/2023 4:43:59 AM(UTC+0)
CC-11	You call him and tell him just like that, to resolve with me today...UI...months have passed, not tomorrow, that after supposedly tomorrow, supposedly another day. It's for right now.	9/14/2023 4:44:14 AM(UTC+0)
SANTOS	No, no, no Viejo. Now was that I talked with him. For real, for real, the "loco" "tranco to." You know that area over there is hot, in the block. No more is going to be put there. He just left out of there right now, and I left from there too.	9/14/2023 4:44:49 AM(UTC+0)
SANTOS	That will...UI...tomorrow early, without fail.	9/14/2023 4:44:56 AM(UTC+0)
CC-11	For tomorrow before 12 "viejo" because I work	9/14/2023 4:45:48 AM(UTC+0)
CC-11	What's up brother?	9/14/2023 3:29:20 PM(UTC+0)
SANTOS	What's up brother?	9/14/2023 6:17:28 PM(UTC+0)
CC-11	What's up with janoy?	9/14/2023 6:39:40 PM(UTC+0)
CC-11	I get out later at 12	9/14/2023 6:39:54 PM(UTC+0)
CC-11	What's up	9/15/2023 3:34:53 AM(UTC+0)
CC-11	Y what's up bro?	9/17/2023 6:18:00 AM(UTC+0)
CC-11	Let's resolve that	9/17/2023 6:18:10 AM(UTC+0)
CC-11	Weo	9/17/2023 9:24:10 PM(UTC+0)
CC-11	Weo	9/19/2023 4:52:04 AM(UTC+0)
SANTOS	What's up, one question, Yours and Wally's is the same	9/19/2023 7:56:53 AM(UTC+0)
SANTOS	Because I talked with him	9/19/2023 7:56:58 AM(UTC+0)
SANTOS	And I was going to pass him that	9/19/2023 7:57:12 AM(UTC+0)
SANTOS	I don't know, let me know	9/19/2023 7:57:17 AM(UTC+0)
SANTOS	So if not, I will give it to you.	9/19/2023 7:57:24 AM(UTC+0)
CC-11	No	9/19/2023 1:50:32 PM(UTC+0)
CC-11	Little brother I told him...that what's mine is mine. To let Wally lose from me, that what's mine is mine...UI...to give me my whole thing.	9/19/2023 1:50:48 PM(UTC+0)

vi. 9/2023, CONVERSATION BETWEEN SANTOS AND JANOY BATISTA

396. Investigators reviewed a text message conversation between SANTOS and JANOY BATISTA. During the conversation, SANTOS and JANOY BATISTA coordinate the distribution of large quantities of controlled substances, negotiate payments to JANOY BATISTA for outstanding drug debts, and discuss the logistics of sending runners from Maine to Lynn to conduct the drug operation by delivering cash and picking up controlled substances.

397. On September 10, 2023, SANTOS asked JANOVY BATISTA, “are you going to give me the 100”, likely referring to 100 grams of drugs. SANTOS then states that he has to “go up”, likely referring to Maine. SANTOS states that he is “here” and is “arriving”. Thirty minutes later, SANTOS states that the item is “missing half”, which is likely referring to the cooked crack cocaine having been reduced by half of the weight. JANOVY BATISTA responds and states that the cocaine is the same that he has cooked and his “doesn’t go down,” meaning does not reduce in weight after cooking it. JANOVY BATISTA then asks SANTOS if the person cooking the crack cocaine “are making it with water that is not purified” because “Chlorine” being in the water used to cook crack cocaine reduces the weight.

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	What did you do, are you going to give me the 100, oh did you (work) that? I have to go up	9/10/2023 3:36:57 PM(UTC-4)
SANTOS	I am here.	9/10/2023 10:09:20 PM(UTC-4)
SANTOS	arriving	9/10/2023 10:09:24 PM(UTC-4)
JANOVY	ok	9/10/2023 10:23:05 PM(UTC-4)
SANTOS	its missing half.	9/10/2023 10:58:03 PM(UTC-4)
JANOVY	But it's the same as mine and mine doesn't go down.	9/11/2023 12:58:08 AM(UTC-4)
JANOVY	you sure they are making it with water that is not purified and Chlorine brings it down.	9/11/2023 1:00:48 AM(UTC-4)

398. On September 12, 2023, SANTOS and JANOVY BATISTA discuss SANTOS taking a whole kilogram of drugs. JANOVY BATISTA asked if SANTOS has left (“Tell me did you leave?”). SANTOS replied, asking if JANOVY BATISTA was the one honking at him (“Was that you that was honking”), and JANOVY BATISTA says that it was (“Yes.”). SANTOS then explains that he did leave, and that the following day he will take a whole kilogram for JANOVY BATISTA (“Yes I left. Tomorrow, I will take care of that for you. I am going to take the whole chicken.”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
JANOVY	Tell me did you leave?	9/12/2023 12:30:03 AM(UTC-4)
SANTOS	Was that you that was honking	9/12/2023 12:30:39 AM(UTC-4)
JANOVY	Yes	9/12/2023 12:31:11 AM(UTC-4)
SANTOS	Yes I left. Tomorrow, I will take care of that for you. I am going to take the whole chicken.	9/12/2023 12:32:03 AM(UTC-4)
JANOVY	Ok	9/12/2023 12:34:18 AM(UTC-4)

399. On September 12, 2023, SANTOS told JANOVY that he is out of drugs and needs more (“I am dry, I need” “that”). JANOVY asked SANTOS if he needs it that day (“today”). SANTOS then tells JANOVY to give him “the ones that are 50 or 100” and SANTOS will give JANOVY \$300 dollars for the new amount of drugs (“300 for that”). SANTOS then explains that when he comes “down” from Maine, he will give the other amount owed (“When I go down I am going to give the other.”). JANOVY then tells SANTOS to give him \$1,500 for the new drugs, and \$1,000 for the old amount owed for drugs (“Give me 1500 for the latest and the 1000 old”), which will let them start a new bill (“and we will start from new”). SANTOS agreed and states he will give JANOVY the money at night (“I will pass you that at night.”). SANTOS then asks for JANOVY to give him the decoration, which I believe to be a quantity of drugs (“But get me the decoration”). JANOVY agrees, and SANTOS states he will give JANOVY the \$300 and JANOVY will give SANTOS the drugs (“Let me know, so that I give you the 300 and you give me that.”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	I am dry, I need	9/12/2023 2:05:56 PM(UTC-4)
SANTOS	that	9/12/2023 2:05:58 PM(UTC-4)
JANOVY	Today	9/12/2023 2:06:12 PM(UTC-4)
SANTOS	Give me the ones that are 50 or 100.	9/12/2023 2:06:29 PM(UTC-4)
SANTOS	I am going to give you 300 for that.	9/12/2023 2:06:49 PM(UTC-4)
SANTOS	When I go down I am going to give the other.	9/12/2023 2:07:02 PM(UTC-4)
JANOVY	Give me 1500 for the latest and the 1000 old.	9/12/2023 2:07:15 PM(UTC-4)
JANOVY	and we will start from new.	9/12/2023 2:07:46 PM(UTC-4)
SANTOS	Ok, I will pass you that at night.	9/12/2023 2:08:08 PM(UTC-4)
SANTOS	But get me the decoration.	9/12/2023 2:08:20 PM(UTC-4)
JANOVY	ok	9/12/2023 2:08:27 PM(UTC-4)
SANTOS	Let me know, so that I give you the 300 and you give me that.	9/12/2023 2:09:30 PM(UTC-4)

400. Later on September 12, 2023, SANTOS asks JANOVY where he is, so that SANTOS can give him \$300. SANTOS explains that he is leaving Maine (“leaving up north now”) and asks JANOVY if there is anyone around that can provide him with the drugs (“I am leaving up north now, do you have anyone there that can give me that.”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	When are you to give you the 300 for the decoration.	9/12/2023 4:16:10 PM(UTC-4)

JANOY	I will call you now.	9/12/2023 4:18:46 PM(UTC-4)
SANTOS	I am leaving up north now, do you have anyone there that can give me that.	9/12/2023 4:25:40 PM(UTC-4)
SANTOS	I am waiting for you.	9/12/2023 4:25:46 PM(UTC-4)
JANOY	Give me 15 minutes.	9/12/2023 4:26:51 PM(UTC-4)
SANTOS	Whats up, I have to go up.	9/12/2023 4:50:27 PM(UTC-4)
JANOY	Call me, to bring me something.	9/12/2023 5:12:43 PM(UTC-4)

401. On September 29, 2023, SANTOS complains that JANOY has told him he would be receiving a certain amount or type of drugs on two occasions, and actually received something else (“it has been two times already that you tell me you are going to give me something you end up giving me something else”). SANTOS notes that JANOY has him going around trying to coordinate the deliveries and pickups (“You have me giving rides and taking rides from here to there.”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	Don't do that to me, it has been two times already that you tell me you are going to give me something you end up giving me something else.	9/29/2023 8:45:14 PM(UTC-4)
SANTOS	You have me giving rides and taking rides from here to there.	9/29/2023 8:45:36 PM(UTC-4)
SANTOS	That will be tomorrow in the afternoon. What will I do, go down again.	9/29/2023 8:45:58 PM(UTC-4)

402. On October 1, 2023, SANTOS told that he sent JANOY something that will be brought by an individual referred to as “Flaco.” SANTOS tells JANOY to “prepare the other thing”, presumably referring to an amount of drugs or crack cocaine that must be cooked and prepared. JANOY responds that he will give SANTOS “a big one.” SANTOS tells JANOY to give the big one to “Guery” because someone is there with Guery (“Give that to Guery because the buddy is there”). JANOY then instructs SANTOS to have GARCIA VASQUEZ bring the money, and SANTOS can come get the item, which I believe to be drugs (“Tell Menor to bring the money and you come and get that, the man is waiting for me.”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	I sent you that with Flaco (the dude/skinny guy)	10/1/2023 10:29:20 PM(UTC-4)
SANTOS	Prepare the other thing	10/1/2023 10:29:29 PM(UTC-4)
JANOY	Ok	10/1/2023 10:29:40 PM(UTC-4)

JANOY	I will give you a big one	10/1/2023 10:35:44 PM(UTC-4)
SANTOS	Give that to Guery because the buddy is there	10/2/2023 12:09:37 AM(UTC-4)
JANOY	Tell Menor to bring the money and you come and get that, the man is waiting for me.	10/2/2023 4:30:57 PM(UTC-4)

403. On October 3, 2024, SANTOS told JANOY to let him know when he has “it” so he can go by and pick it up (“You let me know when you have it so as to go by and pick it up”). SANTOS then states that JANOY’s “thing” is there with SANTOS. SANTOS then explains that the “man” called him and told SANTOS he is out of drugs (“The man called me and said he is dry”). SANTOS then told JANOY that he needs to bring the fentanyl (“down”) up to Maine (“need to bring up the down”). SANTOS tells JANOY that the dealers are calling, and JANOY needs to get the drugs to him (“Try to work that they are calling”). Two hours later, SANTOS has grown frustrated and asks JANOY what he should tell the dealer (“Tell me what do I tell the guy then?”). JANOY responds that the delivery will be that day for sure (“Today for sure”). SANTOS reiterates that he already told the dealer it would have been delivered early in the day, and JANOY did not respond (“I don’t want to be saying things because I told him early and still I don’t know anything. You don’t respond to me.”). JANOY tells SANTOS that he can tell the dealers that the drugs are on the way (“That is on its way.”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	You let me know when you have it so as to go by and pick it up	10/3/2023 11:47:22 AM(UTC-4)
JANOY	I am talking about that for today	10/4/2023 1:34:18 PM(UTC-4)
SANTOS	I have your thing here	10/4/2023 1:34:34 PM(UTC-4)
SANTOS	Uh, to look for mine	10/4/2023 1:34:46 PM(UTC-4)
SANTOS	The man called me and said he is dry. What's up?	10/4/2023 3:58:53 PM(UTC-4)
JANOY	Can I call you later? I am with people in the car and I can't be speaking about anything.	10/4/2023 3:59:11 PM(UTC-4)
SANTOS	I need to bring up the down.	10/4/2023 6:34:13 PM(UTC-4)
SANTOS	Go ahead, I will wait for you there	10/4/2023 6:35:27 PM(UTC-4)
SANTOS	Try to work that they are calling.	10/5/2023 11:50:13 AM(UTC-4)
SANTOS	Tell me what do I tell the guy then?	10/5/2023 1:15:28 PM(UTC-4)
JANOY	Today for sure.	10/5/2023 1:15:59 PM(UTC-4)
SANTOS	I don't want to be saying things because I told him early and still I don't know anything. You don't respond to me.	10/5/2023 1:16:59 PM(UTC-4)
JANOY	That is on its way.	10/5/2023 1:18:02 PM(UTC-4)
SANTOS	How much to I tell those people?	10/5/2023 2:47:27 PM(UTC-4)

JANOY	I am coming down from Providence.	10/5/2023 2:48:14 PM(UTC-4)
SANTOS	But did that already arrive	10/5/2023 2:48:54 PM(UTC-4)
SANTOS	They are waiting for you	10/5/2023 4:17:03 PM(UTC-4)
SANTOS	To go on up.	10/5/2023 4:17:06 PM(UTC-4)

404. Later on October 5, 2023, SANTOS remained frustrated with JANOY, explaining that the customers ask if the drugs are going to be there, and SANTOS' reputation has suffered since the customers cannot trust his word ("The first thing that they asked me is if that is going to always be there and look, one can't give his word to people to then leave them hanging."). SANTOS seems exasperated ("what do I tell these people"), and JANOY does not answer ("you don't answer", "That's not how things are done"). SANTOS simply asks if the drugs are not going to arrive ("Because tell me if that is not going to get here"), and JANOY responds "Give me 5." SANTOS replies that the customers called him and asked if the drugs would be arriving that day ("They called me right now asking if that is going to be today.") and informs JANOY that GARCIA VASQUEZ is arriving ("Menor is arriving there").

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	The first thing that they asked me is if that is going to always be there and look, one can't give his word to people to then leave them hanging.	10/5/2023 4:59:43 PM(UTC-4)
SANTOS	And now what do I tell these people	10/5/2023 4:59:59 PM(UTC-4)
SANTOS	And you don't answer	10/5/2023 5:00:14 PM(UTC-4)
SANTOS	That's not how things are done	10/5/2023 5:00:18 PM(UTC-4)
SANTOS	Because tell me if that is not going to get here	10/5/2023 5:00:26 PM(UTC-4)
JANOY	Give me 5	10/5/2023 6:39:05 PM(UTC-4)
SANTOS	They called me right now asking if that is going to be today.	10/5/2023 6:53:57 PM(UTC-4)
SANTOS	Menor is arriving there	10/5/2023 9:06:37 PM(UTC-4)

405. JANOY states that he is in the kitchen ("Wait I am in the kitchen."). SANTOS asks if JANOY has "that" ("You have that?"), referring to cocaine, and JANOY replies that he does have it, but is checking its quality ("Yes but I am checking it."). SANTOS then tells JANOY that GARCIA VASQUEZ has arrived and wants to know what to tell him ("Menol is there", "So what do I tell Menol"). JANOY replies that he has cooked 31 grams of the cocaine, and it is not cooking properly ("Kid, that doesn't dry up. You cook 31 and it doesn't dry up").

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
JANOY	Wait I am in the kitchen.	10/5/2023 10:00:45 PM(UTC-4)
SANTOS	You have that?	10/5/2023 10:02:09 PM(UTC-4)
JANOY	Yes but I am checking it.	10/5/2023 10:04:15 PM(UTC-4)
SANTOS	Menol is there.	10/5/2023 10:27:44 PM(UTC-4)
SANTOS	So what do I tell Menol?	10/5/2023 10:30:28 PM(UTC-4)
SANTOS	What's going to give me space – you got everybody not taking things seriously	10/5/2023 10:41:43 PM(UTC-4)
SANTOS	That's fine you caught us messing around today	10/5/2023 11:25:57 PM(UTC-4)
JANOY	Kid, that doesn't dry up. You cook 31 and it doesn't dry up	10/5/2023 11:57:57 PM(UTC-4)

406. On October 7, 2023, JANOY asks SANTOS if SANTOS will bring JANOY the fentanyl from the day before (“Will you bring me the F from yesterday”). SANTOS states that he will have GARCIA VASQUEZ bring it down for him tomorrow (“I will bring down for you tomorrow. I will send Menor to bring it down to you”). SANTOS then states he will give JANOY \$9,000 (“I am going to give you 9.”) and JANOY confirms the amount (“9 thousand”) and requests that SANTOS send it that day (“Send it today.”). SANTOS explains that he is in Maine, and GARCIA VASQUEZ is in Lynn (“I am up here, El Menol is in Lynn”), and does not want to have him make multiple trips to Maine (“Eh, so he doesn't come down late”, “because if he goes up and goes down again to go back up.”). However, SANTOS confirms that the package will be ready that day, and for sure on the following day (“That is going be ready today for sure tomorrow.”). JANOY states that SANTOS should have GARCIA VASQUEZ bring the money to a contact named “Steven” and wait for JANOY to arrive (“If he is there, have him give that to Steven and to wait for me”). SANTOS says that GARCIA VASQUEZ does not have money on him (“He doesn't have anything”), but that SANTOS has drugs with him (“I have the work today”, “Here”) and that he will send it over to where JANOY is located (“I send it over there.”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
JANOY	Will you bring me the F from yesterday	10/7/2023 11:22:26 PM(UTC-4)
JANOY	Oh no	10/7/2023 11:22:39 PM(UTC-4)
SANTOS	I will bring down for you tomorrow. I will send Menor to bring it down to you	10/7/2023 11:23:37 PM(UTC-4)
SANTOS	Unless you want to pick it up in Lawrence so as not having to come down again	10/7/2023 11:25:51 PM(UTC-4)

SANTOS	I am going to give you 9.	10/7/2023 11:26:08 PM(UTC-4)
JANOY	Ok	10/7/2023 11:29:06 PM(UTC-4)
JANOY	9 thousand	10/7/2023 11:29:30 PM(UTC-4)
JANOY	Send it today.	10/7/2023 11:30:41 PM(UTC-4)
SANTOS	I am up here, El Menol is in Lynn	10/7/2023 11:31:11 PM(UTC-4)
SANTOS	Eh, so he doesn't come down late.	10/7/2023 11:31:23 PM(UTC-4)
SANTOS	because if he goes up and goes down again to go back up.	10/7/2023 11:31:38 PM(UTC-4)
SANTOS	That is going be ready today for sure tomorrow.	10/7/2023 11:31:48 PM(UTC-4)
JANOY	ok	10/7/2023 11:31:57 PM(UTC-4)
JANOY	If he is there, have him give that to Steven and to wait for me.	10/7/2023 11:33:09 PM(UTC-4)
SANTOS	He doesn't have anything	10/7/2023 11:33:27 PM(UTC-4)
SANTOS	I have the work today.	10/7/2023 11:33:34 PM(UTC-4)
SANTOS	Here.	10/7/2023 11:33:37 PM(UTC-4)
JANOY	ok	10/7/2023 11:34:28 PM(UTC-4)
SANTOS	I send it over there.	10/7/2023 11:35:20 PM(UTC-4)

407. SANTOS and JANOY continue to discuss resupplying SANTOS and his dealers, and SANTOS sending GARCIA VASQUEZ with money to pay and outstanding drug debts. Then, JANOY tells SANTOS that he cannot “call until Steven has the money in hand”, which is believed to be related to getting a resupply of drugs after paying off the outstanding debt. SANTOS states that GARCIA VASQUEZ is going to bring the money to JANOY (“Menor is going there”, “With that money”), and JANOY states that he is not in the area (“I am not around there now”). JANOY states that he is “in a meeting with a Mexican in Boston”, which I believe to be a meeting with JANOY’s drug cartel associate. SANTOS then asks, when JANOY will be providing the drugs (“So when are you going to give us that”). JANOY responds that “Steven” will give SANTOS two “pieces when they bring them”, which I believe to mean two kilograms, and that JANOY is actually with the supplier at the moment (“I am at a party with these people”). SANTOS emphasizes that he is “dry” and needs more drugs, and that last night JANOY left him waiting (“Last night you left me waiting”). JANOY responds that they cannot ask for more drugs without paying for the drugs that they had already received (“you know that I can’t ask for nothing without paying the old ones.”). JANOY reiterates that they will call the supplier when the money is in hand (“When the money is there we will call the people”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	What did you do to not send Menor there because he is in Law	10/8/2023 9:38:26 PM(UTC-4)
JANOY	Let him/them go they are going to get the money and bring that	10/8/2023 9:45:47 PM(UTC-4)
SANTOS	He is going to go down with the money	10/8/2023 9:46:13 PM(UTC-4)
JANOY	Ok	10/8/2023 9:52:29 PM(UTC-4)
JANOY	Go ahead early now	10/8/2023 9:52:42 PM(UTC-4)
JANOY	I can't call until Steven has the money in hand	10/8/2023 10:24:06 PM(UTC-4)
SANTOS	Stop that over there, because Menor is going there	10/8/2023 10:24:34 PM(UTC-4)
SANTOS	With that money	10/8/2023 10:24:38 PM(UTC-4)
JANOY	I am not around there now	10/8/2023 10:25:13 PM(UTC-4)
SANTOS	And when will you be over there	10/8/2023 10:25:29 PM(UTC-4)
JANOY	I am in a meeting with a Mexican in Boston	10/8/2023 10:26:58 PM(UTC-4)
SANTOS	So when are you going to give us that	10/8/2023 10:27:17 PM(UTC-4)
JANOY	I told you that Steven will give you 2 pieces when they bring them I am at a party with these people	10/8/2023 10:36:40 PM(UTC-4)
SANTOS	And that thing is there huh	10/8/2023 10:51:15 PM(UTC-4)
SANTOS	So as not to wait because I am dry	10/8/2023 10:51:21 PM(UTC-4)
JANOY	I explained it to you	10/8/2023 11:02:17 PM(UTC-4)
SANTOS	Steven told me that you dama told him about the money	10/8/2023 11:22:41 PM(UTC-4)
SANTOS	Last night you left me waiting what are we going to do today	10/8/2023 11:23:03 PM(UTC-4)
JANOY	Old man, you know that I can't ask for nothing without paying the old ones.	10/8/2023 11:28:08 PM(UTC-4)
SANTOS	So then what will be done	10/8/2023 11:28:44 PM(UTC-4)
JANOY	When the money is there we will call the people.	10/8/2023 11:29:43 PM(UTC-4)

408. They then discuss the outstanding drug debt. SANTOS asks how much the old drug debt is, JANOY confirms it is \$5,634. SANTOS tells JANOY that GARCIA VASQUEZ is on the way and will give JANOY the money so that JANOY can pay off the debt (“Menor will take care of that for you so that you pay that. He is on the way there”). JANOY then suggests that SANTOS give him \$9,000 and JANOY will give SANTOS one amount of drugs (“If you give me the 9 and I give you 1 you owe me the rest”). SANTOS rejects that plan and states he will only pay what is owed, and will not pay up front for the new drugs (“No I am going to give you what is owed to you”). JANOY then states that SANTOS will need \$14,634 because JANOY will be giving him a large amount of drugs (“You are going to subtract 14634 because what I am going to give you is gigantic”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	They are going to stop with that.	10/8/2023 11:29:56 PM(UTC-4)

SANTOS	How much is the old thing?	10/8/2023 11:30:16 PM(UTC-4)
SANTOS	5400	10/8/2023 11:30:24 PM(UTC-4)
JANOY	5634	10/8/2023 11:31:08 PM(UTC-4)
SANTOS	Menor will take care of that for you so that you pay that. He is on the way there	10/8/2023 11:31:55 PM(UTC-4)
JANOY	If you give me the 9 and I give you 1 you owe me the rest.	10/8/2023 11:32:47 PM(UTC-4)
SANTOS	No I am going to give you what is owed to you dama/lady.	10/8/2023 11:33:16 PM(UTC-4)
SANTOS	Tomorrow when I go down I will complete the 9 for you	10/8/2023 11:33:28 PM(UTC-4)
JANOY	You are going to subtract 14634 because what I am going to give you is gigantic.	10/8/2023 11:44:36 PM(UTC-4)
SANTOS	Yess	10/8/2023 11:44:52 PM(UTC-4)

409. On October 9, 2023, the conversation continues. SANTOS complains that the drug dealers that they are supplying, are not paying the money that they owe (“Those people are sleeping with the money there”). JANOY agrees and suggests that is why SANTOS needs to go there (“That’s why you are going there”). JANOY then tells SANTOS that until the outstanding debt paid, he cannot supply the Trinitarios with any drugs, and he has a lot of drugs on hand (“as long as I’m owed I can’t give you guys anything, and I have a lot”). SANTOS complains that every time a shipment comes in, there are not any whole kilograms available, and that he is not receiving whole kilograms (“every time one comes in, there aren’t any and they are not whole”). SANTOS reiterates that the dealers they are supplying want to see the whole kilogram (“Those people like seeing, the whole chicken”). JANOY then tells SANTOS that a lot of drugs just arrived (“A lot came in”).

AUTHOR	CONTENT - PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	Those people are sleeping with the money there	10/9/2023 9:56:37 PM(UTC-4)
JANOY	That’s why you are going there	10/9/2023 9:56:47 PM(UTC-4)
SANTOS	The kid left already?	10/9/2023 9:57:16 PM(UTC-4)
JANOY	Look it’s not because of me.	10/9/2023 9:58:10 PM(UTC-4)
SANTOS	So were are you today?	10/9/2023 9:59:40 PM(UTC-4)
SANTOS	I called you.	10/10/2023 4:25:37 PM(UTC-4)
JANOY	Talk to El Menol, but I as long as I’m owed I can’t give you guys anything, and I have a lot.	10/11/2023 10:39:58 PM(UTC-4)
SANTOS	I am clear.	10/11/2023 10:41:12 PM(UTC-4)
SANTOS	But every time one comes in, there aren’t any and they are not whole.	10/11/2023 10:41:30 PM(UTC-4)
SANTOS	Those people like seeing, the whole chicken.	10/11/2023 10:41:41 PM(UTC-4)
JANOY	A lot came in.	10/11/2023 10:42:10 PM(UTC-4)

410. On October 18, 2023, JANOY asks SANTOS for the remaining money that he is owed (“when will you give me the other money”). SANTOS asks, “How much are we?” JANOY responds that the amount is \$8,000, and notes that if SANTOS has the money, JANOY has good quality drugs that he can provide to SANTOS (“Give me that, if you have them, I have something good, If can pay that.”). JANOY then clarifies that SANTOS owes him \$16,000, for an amount of drugs totaling 3,500 grams that JANOY gave SANTOS the night before (“its 16 that you owe me, from last night there were 3500”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
JANOY	Old man, when will you give me the other money?	10/18/2023 3:05:37 PM(UTC-4)
SANTOS	How much are we?	10/18/2023 3:05:49 PM(UTC-4)
JANOY	8 thousand	10/18/2023 3:06:03 PM(UTC-4)
JANOY	Give me that, if you have them, I have something good, If can pay that.	10/18/2023 3:40:02 PM(UTC-4)
JANOY	its 16 that you owe me, from last night there were 3500.	10/19/2023 1:38:35 AM(UTC-4)
SANTOS	OK.	10/19/2023 1:58:40 AM(UTC-4)

411. On October 21, 2023, the conversation continues about paying off the outstanding drug debt. JANOY asks SANTOS to bring him “something” to pay off the debt, and he will “grab something”, referring to drugs, the next day (“Bring me something if you have any. I want to grab something tomorrow”). Three days later, JANOY is still looking for payment so he can obtain more drugs: “Tell me when you will settle that for me so that I can grab more.” SANTOS asks what the total amount owed is (“How much are we?”). JANOY responds that “10” or \$10,000 is owed and reiterates that he wants the debt to be paid so “we can grab more” drugs.

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
JANOY	Bring me something if you have any. I want to grab something tomorrow	10/21/2023 12:58:14 AM(UTC-4)
JANOY	Tell me when you will settle that for me so that I can grab more	10/24/2023 6:53:27 PM(UTC-4)
SANTOS	Where are you?	10/27/2023 10:57:17 PM(UTC-4)
SANTOS	How much are we?	10/28/2023 1:10:34 AM(UTC-4)
JANOY	10	10/28/2023 4:47:00 PM(UTC-4)
JANOY	Try to settle that for me so that we can grab more	10/28/2023 4:47:47 PM(UTC-4)
SANTOS	I will call you now.	10/29/2023 11:20:00 AM(UTC-4)
JANOY	Tell me to see,	10/30/2023 12:00:15 AM(UTC-4)

SANTOS	Half hour, he told me almost right now.	10/30/2023 12:10:17 AM(UTC-4)
JANOY	that is going to stay for tomorrow.	10/30/2023 12:22:25 AM(UTC-4)
SANTOS	We are going to leave it for tomorrow.	10/30/2023 12:40:32 AM(UTC-4)

412. The conversation continues on October 30, 2023, and November 1, 2023. JANOY again requests that SANTOS give him “that”, which I believe to be a reference to money, because JANOY has to obtain drugs the following day (“See if you can get that for that I have to get something tomorrow”). JANOY then reiterates that if SANTOS does not pay off the debt, then JANOY will be entirely out of drugs (“if you don’t send me that today I am going to be empty.”). SANTOS then tells JANOY to ensure that he receives high quality drugs, because the customer picking up from SANTOS will not want it otherwise (“but try to work something that’s good because if not the dude will not want that”). SANTOS explains that this customer’s money is what they will use to pay off the debt to the supplier, because SANTOS has not sold all of the drugs he has on hand, and has not accumulated enough to pay off the debt himself (“we are depending on his money because I still have some left and I don’t have enough to pay everything to you”, “He is the one coming up with the money”). SANTOS explains that one of his female drug dealers owes him \$2,400, presumably for drugs provided on consignment, and that comprises a significant portion of the \$10,000 that SANTOS owes to JANOY (“The lady owes me 2400”, “of that 10”). SANTOS then explains that after today’s deal with the customer buying directly, the next resupply they make will be for SANTOS (“After that, the other thing is mine”). SANTOS then states that he will travel down from Maine to pay JANOY a significant amount (“I am going to go down with that to pay you off cool”), and the female drug dealer is looking to make a large purchase (“lady is trying to work something good”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	I am coming down.	10/30/2023 2:24:21 PM(UTC-4)
JANOY	See if you can get that for that I have to get something tomorrow.	11/1/2023 7:15:00 PM(UTC-4)
JANOY	Old man if you don’t send me that today I am going to be empty.	11/1/2023 7:16:19 PM(UTC-4)

SANTOS	Yes but try to work something that's good because if not the dude will not want that. And we are depending on his money because I still have some left and I don't have enough to pay everything to you.	11/1/2023 7:29:40 PM(UTC-4)
SANTOS	He is the one coming up with the money	11/1/2023 7:29:53 PM(UTC-4)
SANTOS	The lady owes me 2400.	11/1/2023 7:30:04 PM(UTC-4)
SANTOS	Of that 10.	11/1/2023 7:30:09 PM(UTC-4)
SANTOS	After that, the other thing is mine.	11/1/2023 7:30:17 PM(UTC-4)
SANTOS	But I am going to go down with that to pay you off cool, lady is trying to work something good.	11/1/2023 7:30:49 PM(UTC-4)

413. On November 1, 2023, JANOVY tells SANTOS that some items he has inspected are “pretty,” which I believe to be a reference to high quality drugs (“Those are pretty”). SANTOS asks if JANOVY has seen them, and if they are complete, which I believe to mean whether the kilogram bricks are whole or have been broken down (“Did you see them?”, “It has everything”). About an hour later, JANOVY tells SANTOS to come in, presumably so he can see them himself (“Come in”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
JANOVY	Those are pretty.	11/1/2023 8:15:49 PM(UTC-4)
SANTOS	Did you see them?	11/1/2023 8:16:27 PM(UTC-4)
SANTOS	It has everything	11/1/2023 8:16:41 PM(UTC-4)
JANOVY	Come in	11/1/2023 9:19:37 PM(UTC-4)

414. Then, on November 12, 2023, at 9:57 PM, less than twelve hours before the shooting on Horton Street in Salem, MA, the following morning, SANTOS tells JANOVY that he has a firearm chambered in .357 magnum (“I have a magnum 357”).

AUTHOR	CONTENT – PRELIMINARILY TRANSLATED	DATE - TIME
SANTOS	I have a Magnum 357	11/12/2023 9:57:12 PM(UTC-5)

vii. 9/2023, CONVERSATION BETWEEN SANTOS AND “EL LIDER”

415. Investigators have reviewed a text message and audio message conversation taking place over the Signal Application, between SANTOS and an individual identified as “El Lider” in the chat. The name “Lider” roughly translates to “leader.” During the chat, SANTOS and Lider discuss the transportation of large quantities of controlled substances and share videos and images of numerous kilogram brick size packages of drugs. It appears that Lider is sending these drugs to

SANTOS through a well-known international shipping company, and Lider and SANTOS exchange images and videos tracking those shipments and deliveries. Additionally, Lider explains that his smuggling scheme employs a manager for a well-known international shipping company. Lider explains in detail how this manager is paid by Lider to ship the packages in a manner to avoid interdiction by Customs and Border Patrol (CBP). During the course of discussions with Lider, SANTOS describes his other source of supply being a Mexican drug cartel, and compares the quality he is receiving from the cartel to the drugs offered by Lider.

416. In two images sent on August 19, 2023, Lider sent a photo of six kilogram-sized bricks on what appears to be a bedsheet. These bricks appear to be packaged for transportation and have a logo of an anchor on them (21c814bd-7f46-4a4d-85cc-33f3548a800c.jpg, 47bb2ebd-b56a-4eaa-bd0e-a6cc92258145.jpg).



417. On August 19, 2023, Lider sent another image to SANTOS (0600f544-456a-4cf0-8783-645de14e51c2.jpg) depicting numerous kilogram bricks of controlled substances packaged in black plastic wrapping. In total there appears to be more than 40 kilograms of cocaine or fentanyl visible in the image sent by Lider. After sending the image depicting over 40 kilograms, Lider then tells SANTOS to “Look there, buddy, look there. They have that stamp and that is what you see there.”



418. Following these images, Lider sent SANTOS a series of images and videos depicting the packaging methods and concealment techniques that he is utilizing. For example, in a 1 minute and 42 second video sent by Lider to SANTOS on August 19, 2023 (11947bca-d3a7-42bf-bb6e-01c0d2f8368a.mp4), the packaging process for drug shipments can be observed. Cellophane wrapping is visible along with numerous packaged bricks that appear to be awaiting this secondary smuggling process. A gloved hand rubs what appears to be a masking agent on a

packaged brick, followed by what appears to be coffee grinds. The brick is then further packaged in additional black wrapping paper, and is secured with elastics. Once secured in elastics, a layer of tin foil is wrapped around the brick. The finished brick is then inserted into a small hollow item that appears to be a ceramic owl. Chickens can be heard in the background. Still images from the video depicting this process follow:





419. Lider then sent SANTOS another video demonstrating the packaging and concealment techniques (60362b21-094f-449f-bf5f-475748f600a1.mp4) that was 2 minutes and 8 seconds long. In the video, multiple bricks can be observed. A gloved hand appears and rubs a substance on a packaged kilogram brick and then coats the brick in coffee grinds. As before, the kilogram brick is wrapped in paper, secured with elastics and then wrapped in tinfoil. Once packaged, the brick is then concealed in the bottom of a hollow ceramic owl.



420. Lider then sent SANTOS two images of shipment tracking information, listing Santo Domingo, Dominican Republic as the origin, and Oklahoma City, OK as the destination. Investigators believe this is an example shipment showing SANTOS how Lider packages drugs for shipment to the United States for another customer.

421. Lider then sends SANTOS an image of a ceramic owl (9bf9c823-9bb8-457f-bc57-ea3c1bcda057.jpg), followed by a video of a box (2e061e87-0684-4dcb-aed1-297dd32bc188.mp4).



422. Lider then sent a video of showing a kilogram brick being inserted in the base of a hollow ceramic owl. During the video, there is a voice that states the following: "Look at the other one right here. It's well prepared. Look, here goes this one and look where the other one is. You see? The other one goes in there. Right there. You see? So then, this right here will be closed, you understand me? Then, I'll put- I'll put candies in here, I'll put a lot of little things in it so that it won't move. You see how both of them fit in there... so, I'll make you a video when I'm prepping the box after I'm done with this." I believe in this message, Lider is explaining that each owl will contain two kilograms and that he will secure them within the owl.

423. Lider then sent images of shipment tracking information, followed by an owl in cellophane wrap.



424. After sending the owl image, Lider stated, "Send the address." SANTOS replied, "5 Lily st lynn MA."

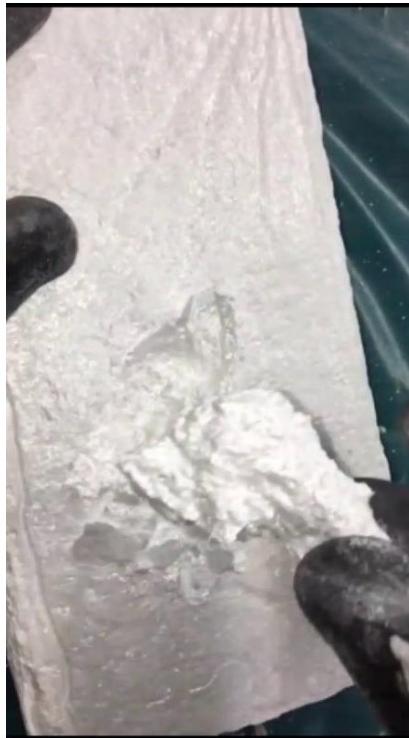
425. After this, they coordinated payment by SANTOS to Lider through an international money remitter. Lider sent a Dominican passport of a female associate and directs SANTOS to send the money to that woman. Further coordination took place, and Lider sent a voice message requesting payment so that he can send the box containing the drugs ("I can video call you to show you the whole thing. You understand me? I have it right in front of me. Tell me if I can video call you to show you everything. And try to... try to send me that money before twelve (12:00) in the afternoon, you heard, leader? So that I can send you the box tomorrow, as early as possible. I mean, sorry, it is today, because it is already two (2:00) in the morning, today, as early as possible.").

426. Shortly after sending that voice message, Lider sent SANTOS a video file (4a8a1f3e-2388-435f-8228-7fac40261aec.mp4) to SANTOS, which is 1 minute and 57 second long. During the video, multiple layers of packaging surrounding a kilogram brick are removed, revealing what appears to be cocaine or fentanyl within the wrapped package. The individual then breaks the brick in order to show the consistency and quality of the drugs.



427. A few seconds later, SANTOS stated, "Send me one of them unwrapped like that, dude, so I... can see the quality, that way I can- I'll start spreading the word out here so that as soon as that gets here- as soon it arrives I can right away... I'll move that right away."

428. A few minutes later, Lider sent SANTOS a video (071a3cf6-0717-4f46-af27-606fe78c78d6.mp4) depicting a kilogram brick of cocaine or fentanyl. The brick is then punctured by a screwdriver, and chipped portion of the brick is picked up and brought closer to the camera to demonstrate the quality. The brick is then judo-chopped by a gloved hand and it breaks into two pieces. The edge of the brick is then brought closer to the camera to demonstrate the consistency.



429. Lider then sent a voice message stating, “I opened those two (2). Look, I opened those two (2) and I made a video, look there. Those have ninety-eight (98) purity. Leader, you heard? That’s ready- ready.”

430. SANTOS responded and discussed purchasing a large quantity of drugs through their relationship in the future. SANTOS tells Lider that while Lider had mentioned 82 kilograms on hand, Lider will need 200 or 300 kilograms, because SANTOS’ customers are buying 5 to 10 kilograms each. SANTOS then boasts that the kilograms will sell like “hotcakes” -- if 5 kilograms arrive at 9:00 AM, he will have them sold by 5:00 PM. Specifically, SANTOS states,

Clarify me something, for real, for real. Because I’m interested in working, you understand me? At the end of the day, what I like is to make money. If you don’t have any connections up here, trust me, you’re talking to someone who is... I’m going to put you... on with the real people that... so you allegedly have eighty two (82) there, you start dealing with me and you’re gonna have to send me two-hundred (200) or even three-hundred (300), because the people I have, they’re grabbing from five (5) and from ten (10), you understand me? So, it’ll go like hotcakes, like... listen, those five (5) are arriving today at nine (9:00)... if the work is good, by five (5:00) in the afternoon they will be already gone, trust me.

431. Lider then explained that he bribes a manager at a shipping company to facilitate the packages of drugs being shipped (“That work is a, that work is done by the [COMPANY NAME] manager and they have arrived to their destination just fine, you understand me? But that’s what he does, there aren’t any kind of drawbacks there.”).

432. Lider then sent a video depicting five kilogram bricks wrapped in cellophane (656a5530-19ed-45a8-86af-470a308b2ba0.mp4). During the video, a voice can be heard stating, “Look here, look here, look here. Those are the five (5), those are the five (5) chickens. Look here. We’re sending those five (5) chickens to you. Look here, leader, look here. [BACKGROUND: CHIME] you can see it there. Look here.” In this message, Lider uses the term “chicken” to refer to kilogram bricks, meaning that he is sending SANTOS five kilograms.



433. They then arrange payment and coordinate the international wire of money from SANTOS to an associate of Lider. SANTOS then states that while he is only sending a small amount now, they will be sending over \$400,000 ("All right, all right, dude, I'll do that for you, for real. But... we need to deal for real, because for real, for real... that money I'm sending you is not that much, for real, for real. Let us work together so you can see how much money I'll be sending you... I'll be sending it to you and it won't be four-hundred (400), it'll be four hundred thousand (400,000) if things go according to what you are saying."). After further discussion, SANTOS then sent a receipt showing a wire transfer for \$400.

434. A few hours later, Lider sent SANTOS a video and multiple images depicting a package in cellophane (“bef84a86-ee14-4038-b9a4-13ad54f9cddb.mp4”). The address information on the package states “Oscar Santos, 5 Lily St. Lynn, MA” – the phone number listed ends in 1610, which is a phone number used by SANTOS. The listed weight of the package is 10 lbs, and the cost is \$800. During the video, a voice can be heard stating that the box is ready, and that the manager from the shipping company will contact SANTOS to coordinate the delivery; the voice also refers to three kilograms in the package (“This box was already prepared with everything, look here. That is the box you’re going to receive over there, look here, look. Look at it, look. Now, the manager from [shipping company] is going to get in direct contact with you, you heard? He’s going to call you early tomorrow, the manager from [shipping company], look here. The address is there and everything, your phone number... good. You see here? Look here, look. Look, the three (3) chickens are in there.”).

435. The next day, on August 20, 2023, SANTOS sent an audio message (“2064612b-eb85-4817-97b4-0a3e2e511332.opus”) to Lider telling Lider to send a video depicting the kilograms of cocaine. SANTOS explains one of SANTOS’ associates is with SANTOS and the associate would like to work and sell drugs with SANTOS as well (“Buddy call me; call me to show me some of those chickens. I’m here with one of the... one of my guys that I mentioned you, I told him what was up with that and he said he is willing to work, for real, for real.”).

436. On August 21, 2023, Lider and SANTOS discussed the delivery time and payment. SANTOS tells Lider that if the drugs are high quality, he will be able to sell the entire shipment on the same day it arrives (“if the quality is good, it will leave the same day”). Lider responded that the quality of the drugs is 98% pure (“Dude, I can assure you the purity of it is ninety-eight

(98). The purity is ninety-eight (98).”). For a few days, they continued to discuss delivery dates and payments.

437. On August 30, 2023, SANTOS sent Lider a series of text messages, audio messages and a video of an unwrapped kilogram brick (“109f82f9-b04a-447d-8bba-5d216b6e8157.mp4”).

- a. SANTOS tells Lider that he will have some kilograms he is obtaining from a Mexican source of supply (“Wait until I get some of the Mexican’s chicken”) and that will prove the quality that SANTOS is currently receiving (“So that you can see what quality is”).
- b. Lider responds and states that his drugs are 98% pure, and that SANTOS should send his father to visit Lider and he will give SANTOS’ father three kilograms (“My stuff has quality, my stuff has quality, my stuff is ninety-eight (98) pure, buddy. My stuff is ninety-eight (98) pure, but I don’t want to let you down. But, send your father plus someone of your trust, I’ll give them three (3) chickens and tell me how much, give or take, you’re going to send me with your father. We’re going to meet up at a public space.”).
- c. SANTOS then sends a video of an unwrapped kilogram brick.



- d. SANTOS then tells Lider that the kilogram brick he just sent carries the stamp of the cartel New Era in Mexico (“Ask... ask for New Era, the cartel New Era in Mexico and look at the stamp that’s on there.”), and reiterates that the purity he is receiving from the cartel is “Ninety nine point nine percent” (99.9%).

- e. Lider asks SANTOS to cut the brick in half so he can see the quality (“Cut it in half so I can see it, cut it in half, dude.”).
- f. SANTOS replies that he does not have that kilogram any longer, and it was from the Mexican cartel, but was priced too high (“No, I don’t have that with me anymore. That was something came from the Mexicans, they wanted to see if I would grab it, but they were giving me a high price, but you tell me, I have no other choice. Run with it and that’s it”).
- g. SANTOS sent a text message to Lider stating that he runs all of Massachusetts (“This is what it is, leader[.] I run all of Massachusetts [,] I’m not a dummy[.] Are we going to work or are we going to do something”).

438. On August 31, 2023, SANTOS and Lider exchanged messages.

- a. SANTOS sent a text message to Lider stating, “Look leader [,] 15 chickens arrived just now [.]” I believe this text message refers to fifteen kilograms having just arrived. SANTOS continues on to state that he will check their quality and see if he likes them (“I’ll go see the quality and to see if I like them”). SANTOS then offers to show the quality of the drugs he is getting to Lider when he picks them up (“I’ll show it to you when I grab it [,] if I like it, so you can see it”).
- b. SANTOS sent a video to Lider (8f32f0b6-480f-47cc-acf8-b09e86c3bdb4.mp4) that depicts a kilogram brick of controlled substances that appears to be cocaine or fentanyl is unwrapped. A knife is then used to demonstrate the consistency of the drugs. In the video, SANTOS directs Lider’s attention to the drugs he is receiving. The other individual asks, what the price is for a whole kilogram of what Lider is selling, and SANTOS asks the question to Lider. The other individual then indicates that the quality is good because it is not garbage from Puerto Rico. SANTOS then states that the price as being \$19,500. During the video, SANTOS’ voice and another individual (UM1) can be heard stating the following:

SANTOS: look here, leader.

UM1: Uh?

SANTOS: The number.

UM1: How much he has it going for, a whole one, one piece?

SANTOS: how much you have it going for?

UM1: [U/I] that’s not that garbage from Puerto Rico.

SANTOS: (U/I) nineteen and a half (19 ½).



- c. SANTOS sent a second video to Lider (54bda11a-6935-46a9-8584-cf58efaed4b7.mp4) where multiple kilogram bricks can be observed sitting on buckets. It appears that SANTOS then picks up the bricks and shows them to the camera.



439. On September 4, 2023, SANTOS sent Lider an audio message. In the message, SANTOS stated that he and four others are in “control of the entire city”, and that Lider saw when he grabbed the 2 kilograms they were sold promptly (“you saw when I grabbed those two (2). I grabbed those two (2) chickens and they’re gone already”). SANTOS then states he now has to wait for more drugs and does not like being out of drugs (“Now I have to wait for more. That’s what I don’t like, being dry”). The text message follows,

I already told you, dude. You... I look like a kid and all of that, but at the end of the day, everyone that knows me knows what’s up with me. I’m in control this down here, the four (4) of us control the entire city, no one can come to us like that no, that I don’t know what, nothing like that. The best of the best, you saw

when I grabbed those two (2). I grabbed those two (2) chickens and they're gone already, I don't have anything. Now I have to wait for more. That's what I don't like, being dry, but you tell me, you guys have everything over there and don't-and it looks like you guys don't want to work with me, like I'm going to steal one of those things or something, tell me, let's do it, let's work and you will see what's up with me.

440. On October 6, 2023, Lider sent a video to SANTOS (216b61dc-79e8-4adf-9cd9-e36ee68d80c5.mp4), that depicts an unwrapped kilogram brick of cocaine or fentanyl. The kilogram brick can be observed to have a "whale" stamp visible. A knife then chips part of the brick and the camera then zooms into show the consistency of the controlled substances.



441. SANTOS responded, sending Lider an image (1a2d785a-49a4-4142-a695-b208cc724470.jpg) that depicts a screen capture of a video depicting an unwrapped kilogram brick with a "1919" stamp on it. In the background of the image, additional wrapped kilogram bricks can be observed. After sending the video, SANTOS stated, "Look at this shit how it looks", "You can tell the quality from afar."



viii. 4/24/24 SEARCH OF DIAZ LIRANZO'S RESIDENCE

442. On April 24, 2024, MSP executed a search warrant at DIAZ LIRANZO's residence at 153 Crescent Street, Revere, MA. During the search of DIAZ LIRANZO's bedroom, investigators located approximately 20 grams of fentanyl.

B. 3/13/2023, DISCUSSION OF FIREARM SALES

443. Multiple cooperating witnesses have described GARCIA VASQUEZ as a source of supply of firearms for the Trinitarios. These cooperating witnesses have described GARCIA VASQUEZ as sourcing firearms from New Hampshire and Maine through drug dealers and drug users that GARCIA VASQUEZ comes into contact through the distribution of controlled substances in those states.

444. During a search of SANTOS' phone, investigators located a conversation between SANTOS and JORDANI taking place on March 2, 2023, where they discuss the sale of firearms.

JORDANI asks SANTOS if anyone selling firearms (“is there no steel for sale around there? Any one selling steel?”). SANTOS responds that he believes two Glocks are for sale and send an image of them (“I heard there were 2 around there, there 2 Glocks. Was up?”). JORDANI asks for a price (“Price”), and SANTOS responds that he will check with GARCIA VASQUEZ and he believes that GARCIA VASQUEZ wants to keep both up in a trap house, but he will ask if he can have one for a good price (“let me check with El Menor, that sent me that photo by it seems that El minor wants to stay with both, for up there. Let me see if I can take one off of him for a good price”). JORDANI asks him to inquire and send him a price (“Go and look, go and look and let me know a price right away”).

AUTHOR	PRELIMINARY TRANSLATION	DATE-TIME
JORDANI	Is there no steel for sale around there? Any one selling steel?	3/2/2023 7:02:38 PM(UTC+0)
SANTOS	I heard there were 2 around there, there 2 Glocks. Was up?	3/2/2023 7:39:27 PM(UTC+0)
SANTOS	 A photograph showing two silver-colored handguns (Glocks) lying side-by-side in an open black carrying case. The case has a patterned lining.	3/2/2023 7:39:49 PM(UTC+0)
JORDANI	Price	3/2/2023 7:52:51 PM(UTC+0)
SANTOS	let me check with El Menor, that sent me that photo by it seems that El Menor wants to stay with both, for up there. Let me see if I can take one off of him for a good price.	3/2/2023 8:32:27 PM(UTC+0)

JORDANI	Go and look, go and look and let me know a price right away.	3/2/2023 9:12:01 PM(UTC+0)
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C. 8/23/23 UNARMED ROBBERY OF FEDEX DRIVER

445. According to Wakefield Police Department Report #23-8718, on August 23, 2023, at approximately 3:30 PM Wakefield Police respond to 585 Lowell Street in Wakefield, MA, for a report of an unarmed robbery of a package. When police arrived, they spoke to a Fedex drive and a homeowner named “Shannon.” The Fedex employee stated he was delivering a package and rang a doorbell, when a black male approached him from behind. The black male asked the Fedex driver if the package was for “Shannon.” At this time, Shannon opened the door and the Fedex employee presented it to Shannon for her to take. Right then, the black male snatched the package and ran to a nearby gas station. The black male was described as having facial hair, a white tee shirt and short. The package that was stolen contained a black 128 gb iPhone 14 Pro Max valued at more than \$1,000. It appears that the Fedex driver and Shannon had a limited opportunity to observe the black male and the incident happened very quickly.

446. Wakefield Police determined through review of surveillance video that the black male was utilizing a white Kia Sorrento bearing license plate 4NCR11. Multiple police reports were discovered recounting incidents where DIAZ LIRANZO was operating the white Kia Sorrento bearing license plate 4NCR11 during interactions with police.

447. The Fedex driver and Shannon were shown a photo array containing a photograph of DIAZ-LIRANZO. Neither witness identified DIAZ-LIRANZO as the black male. Shannon identified another individual with 60% certainty. Investigators reviewed the surveillance video that depicted the black male suspect. That individual appears to have a similar build, and facial structure as DIAZ LIRANZO. Additionally, the witnesses identified the black male suspect to have facial hair, and DIAZ LIRANZO has a beard.

448. Additionally, the surveillance images and video shows the black male suspect wearing bright neon yellow sneakers with areas of black coloring. Investigators reviewed Instagram account data for an account used by DIAZ LIRANZO and identified a photograph where DIAZ LIRANZO is wearing bright neon yellow sneakers consistent with those visible in the surveillance video. Two still images from the surveillance video and the image from the Instagram account data depicting DIAZ LIRANZO wearing the bright neon yellow sneakers (and the Trinitario beads and making Trinitario gang signs) follow:



449. Investigators observed photographs from DIAZ LIRANZO's Instagram account data that suggests he is engaged in package thefts from FedEx drivers. In particular, I observed a

photograph, which DIAZ LIRANZO posted to his Instagram on January 4, 2023, wherein DIAZ LIRANZO solicits Fedex drivers to contact him and offers them money, which is consistent with DIAZ LIRANZO conducting thefts and receiving inside information about particular package deliveries, including specific deliveries containing Apple iPhones and the customer information related to those deliveries. As noted above, the black male from the robbery incident was aware of the first name of the person to whom the delivery was addressed.

450. Investigators obtained cell site location information (CSLI) for DIAZ LIRANZO's cellular phone ending in 3054. The CSLI for the DIAZ LIRANZO's cellular phone shows that it utilized a cell tower in Wakefield, MA, located a few hundred feet from the robbery location on August 23, 2023, from 1:30 PM until 3:00 PM. The unarmed robbery was called into police at approximately 3:30 PM. The use of this cell tower is consistent with DIAZ LIRANZO travelling to the location of the package delivery and waiting for the driver, and then intercepting the package.

D. PACKAGE THEFTS

451. The investigation has also revealed that the Trinitarios undertake coordinated efforts to steal packages delivered by common carriers that contain cellular phones and other Apple products. Based on cooperating witness information, and information derived from cellular phones, I know that these specific deliveries containing cellular phones are identified by individuals located in the Dominican Republic. These individuals in the Dominican Republic obtain access to information about which shipments contain cellular phones through various means, including access to internal databases of retailers and access to insurance information for particular packages obtained from the carrier. Once the tracking information for a package is identified, these foreign based conspirators then sell the tracking information to Trinitario gang members and associates to conduct the actual thefts.

452. The Trinitarios pay the foreign based conspirators for the tracking information and it is transmitted to them via third party messaging applications. The Trinitarios then use the tracking information to coordinate the package thefts at the delivery addresses shortly after the package is dropped off. Once in possession of the stolen package containing the phone, the Trinitarios then seek to monetize the stolen phones and accessories through selling them online or through dealers in stolen property located in New York or the Dominican Republic. Even if blacklisted on U.S. based cellular networks, the stolen cellular phones can be activated in other countries. According to information developed in this investigation, stolen phones can be sold for upwards of 50% to 70% of retail value, for high-end and large memory models.

453. Review of cellular devices revealed that the thefts are organized and executed through the Trinitarios enterprise, with PAULA-CABRAL, DIAZ LIRANZO, ROMAN, and other members and leaders playing roles in recruiting members and associates to conduct the thefts,³⁴ obtaining the tracking information from conspirators based in the Dominican Republic, disseminating the information to the members and associates who will be conducting the thefts, and then facilitating the monetarization of the stolen phones through interstate and international shipment of the stolen devices. In particular, the leadership of the Trinitarios have access to the individuals based in the Dominican Republic who obtain access to and deal in the shipment information.

³⁴ As noted above, during the December 1, 2024, meeting, JEFFREY SANTANA instructs the gathered members that they can engage in phone thefts by working with DIAZ LIRANZO (“If you want to hustle, and you don’t know where to get something to hustle, there’s him right there, he is always there for you; there’s Sosa. You don’t want to work hustling, so work with the phones, bro, he can put you on Uber [PH], bro; a phone a day, and you can make approximately a hundred (100) bucks, or one hundred and fifty (150) bucks, and you cannot say no, bro.”).

454. A text and audio conversation between PAULA-CABRAL and DIAZ LIRANZO exemplifies the organized structure of these thefts. In this conversation, PAULA-CABRAL tells DIAZ LIRANZO he will fund the purchase of a few tracking numbers and will have the Trinitario members steal the phones to earn money (“I’m going to send you a few bucks to have the guys do something. For you to send me a few tracking [PH], to, to send the guys to pick up”). DIAZ LIRANZO replies that the delivery locations are quite a distance away (“Because to tell you the truth the tracking that I’m getting, is to go far away”). PAULA-CABRAL insists and offers to send over \$200 so that he can fund the Trinitarios making some money (“No, but we spoke the other day, and you told me to get you two hundred (200) bucks, for you to get a few tracking [STAMMERS] so I can have the guys make some money”). DIAZ LIRANZO indicates that he will need to turn the cash into BitCoin in order to pay the broker for the tracking information. PAULA-CABRAL then reiterates that he would like to fund a few thefts to allow the members to earn some money, and that he has already communicated with ROMAN (Woopty) about getting a group together to conduct the thefts (“You let me know to see if can have the thugs make a little some, because Woopty [PH] that cocksucker told me to activate the car; to activate the thugs and he will call them”). DIAZ LIRANZO then explains that he normally sends DARWIN BATISTA (Py) and DAVID GARCIA to do the thefts, but they are not good at conducting the thefts and are somewhat lazy in their execution (“I normally send a few thugs, like Py, and David”, “they don’t want to wait, they get desperate, of it not, you already know, they don’t go and pick it up”). A preliminary translation of the text and audio messages exchanged between PAULA-CABRAL and DIAZ LIRANZO follow:

AUTHOR / FILENAME / DATE	CONTENT

PAULA-CABRAL 97ffda62-3f39-4d04-aea2-b3587bd577fd.opus 12/13/2023 5:24:10 PM	I'm here getting a haircut at Canela's. What's up? I'm going to send you a few bucks to have the guys do something. For you to send me a few tracking [PH], to, to send the guys to pick up.
Sosa Lanezz bb908143-064f-44ac-a227-69e89cf7e242.opus 12/13/2023 5:45:19 PM	What do you mean? And do you have... You need tracking? You need tracking, is that what it is, for me to send to you? Because to tell you the truth the tracking that I'm getting, is to go far away; they are sending it to me to, Andover, and like that, faraway places such as Hamilton, far, far, you already know. They are not sending me to the city, to tell you the truth.
PAULA-CABRAL f195176b-0639-45f9-8f85-85b5d8410a0a.opus 12/13/2023 6:15:33 PM	No, but we spoke the other day, and you told me to get you two hundred (200) bucks, for you to get a few tracking [STAMMERS] so I can have the guys make some money.
Sosa Lanezz 86ab0cf9-a6a6-4412-b7aa-5dd4458e8849.opus 12/13/2023 6:16:21 PM	Oh yeah, yeah, yeah, that's for the Bitcoin [PH]. I'm going to talk to the guy to see if he needs that right away, or if anything I'll send it to you, and you can... or you can have them make some, and we'll make something out of if somehow. Let me call the guy to see if he needs more Bitcoin.
PAULA-CABRAL abc4085a-d078-4a58-bf79-5920b185eeb8.opus 12/13/2023 6:17:16 PM	You let me know to see if can have the thugs make a little some, because Woopyt [PH] that cocksucker told me to activate the car; to activate the thugs and he will call them. I create a group and called him, but he thinks that I don't know why... why he is not calling.
Sosa Lanezz 7c7ea09b-5558-4579-b030-29370a3440c4.opus 12/13/2023 6:25:44 PM	Alright, alright, alright Gordo, but the thing is that the thugs are lazy too, Gordo, because I normally send a few thugs, like Py, and David, you know, they pick it up for me, but it's once that is already there, I tell them, "Listen, that arrived already go get it." But they don't want to wait, they get desperate, you already know, they don't go and pick it up, they don't have the courage to go and pick it up.
PAULA-CABRAL 89d6122b-feb2-4dcb-a973-94742075809e.opus 12/13/2023 6:25:44 PM	Oh no, so if they don't have the courage to do that, I'm not going to invest my money on that.
Sosa Lanezz f4acf39c-1948-4b85-ad70-315dda881d85.opus 12/13/2023 6:39:12 PM	But believe what I'm telling you. [CHUCKLES] believe what I'm telling you. If you want you can give it a try and test them, to tell you the truth, but I already tried a few times, You feel me? And they leave the place, and all.
PAULA-CABRAL 49b03e5b-ea43-439c-9584-dc970e327f04.opus 12/13/2023 6:58:04 PM	But if you are telling me that they are not good for that, why am I going to put it to a test, to lose my money? No dude, I have too many problems to be losing money.
Sosa Lanezz 8af41a8e-954f-4c9c-900a-36289f1a619a.opus	No, I'm just letting you know, to be honest my boss, because, uh-huh, they let me down with that, to tell you the truth. They move too fast, they don't want to wait. But, it's like I tell you, if you

12/13/2023 8:45:38 PM	want you can try, you never know, they might act different with you, you never know.
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455. PAULA-CABRAL also goes on to ask DIAZ LIRANZO for one of the stolen phones so that he can activate it for his father. DIAZ LIRANZO indicates that he is going to be obtaining a few phones this week and asks if he wants an iPhone 15. PAULA-CABRAL indicates that it could be an iPhone 13, 14, or 15, if it is stolen (“if it’s from the hustle”).

AUTHOR / FILENAME / DATE	CONTENT
PAULA-CABRAL 2579db86-ceb8-4dec-8a10-113fab861565.opus 1/7/2024 3:43:32 PM	That's the attitude; that's the attitude. Listen Negro, I need an, an iPhone. What's up? Those iPhone that you get, do they come out unblocked, or can they get unblocked?
Sosa Lanezz 0e1324d9-b4eb-4c57-85a5-ebb1aeb772fe.opus 1/7/2024 6:06:00 PM	I'm getting some; I'm getting some and they are coming unblocked. Just yesterday I sold one, a thirteen (13), 128 fully unlocked, to tell you the truth, I'm getting some. So you already know, I'm going to let you know of... I'm going to let you know this week, because I think I'm going to get a few. But which one do you want, a fifteen (15); a fifteen (15)?
PAULA-CABRAL 1/7/2024 9:45:07 PM	Check on that, is for my dad.
PAULA-CABRAL 1/7/2024 9:45:19 PM	It could be 13-14-15.
PAULA-CABRAL 1/7/2024 9:45:26 PM	It doesn't have to be pro Max.
PAULA-CABRAL 1/7/2024 9:45:31 PM	But if it's from the hustle.
PAULA-CABRAL 1/7/2024 9:45:39 PM	We can manage; work with me on that.
Sosa Lanezz 1/8/2024 5:26:37 AM	Sound good bro, I'll let you know tomorrow moving forward.
PAULA-CABRAL 1/8/2024 5:27:12 AM	Sounds good.
Emmanuel Paula 1/8/2024 5:27:20 AM	I'll be here.

456. Investigators located the group chat that PAULA-CABRAL referenced with DIAZ LIRANZO concerning the phone thefts. The participants in that conversation were PAULA-CABRAL, ROMAN (under the contact name “TMT Whopty”), DAVID GARCIA (under the

contact name “Bamb7no7”), and DARWIN BATISTA (under the contact name “El Py”). During the conversation, they discuss travelling to other states such as New Hampshire and Ohio to steal the packages and also indicate that they will need multiple vehicles. ROMAN then sends the personal identifying information of a package recipient in Woburn, MA, that they intend to target.

AUTHOR / FILENAME / DATE	CONTENT
PAULA-CABRAL 12/2/2023 11:43:18 PM	What's up?
ROMAN 12/2/2023 11:43:55 PM	Active.
GARCIA 12/2/2023 11:44:39 PM	Active.
ROMAN 12/2/2023 11:45:09 PM	Goldo, give the light.
ROMAN 12/2/2023 11:45:13 PM	To the guys.
PAULA-CABRAL 12/2/2023 11:45:18 PM	@17812856463 and to NH, what's up? To activate a group over there.
ROMAN 12/2/2023 11:45:23 PM	[REPLY TO: @17812856463 and to NH, what's up? To activate a group over there.] Yes.
ROMAN 12/2/2023 11:45:25 PM	Of course.
ROMAN 12/2/2023 11:45:26 PM	Bri. [Typo]
ROMAN 12/2/2023 11:45:28 PM	Bro.
PAULA-CABRAL 12/2/2023 11:45:40 PM	They know what's up, you just have to give them the coordinates.
ROMAN 12/2/2023 11:45:44 PM	We need at least 3 cars
ROMAN 12/2/2023 11:45:49 PM	In Mass
PAULA-CABRAL 12/2/2023 11:45:51 PM	Go with them to the first pick up, and then we move forward after that.
ROMAN 12/2/2023 11:45:52 PM	And two for NH.
ROMAN 12/2/2023 11:46:02 PM	REPLY TO: Go with them to the first pick up, and then we move forward after that.] They already know.
ROMAN	?

12/2/2023 11:46:04 PM	
ROMAN 12/2/2023 11:46:15 PM	I'm going with them.
ROMAN 12/2/2023 11:46:20 PM	So they can see what's up.
ROMAN 12/2/2023 11:46:21 PM	How it is.
GARCIA 12/2/2023 11:46:53 PM	Isn't doing the authorization and then we go and pick it up at the store?
ROMAN 12/2/2023 11:47:02 PM	REPLY TO: Isn't doing the authorization and then we go and pick it up at the store? Nooo.
PAULA-CABRAL 12/2/2023 11:47:10 PM	No, is about the packages that I told you.
PAULA-CABRAL 0ce96002-e8fd-4d25-a85d-428cc4462bfd.opus 12/2/2023 11:47:29 PM	Bambino, do you remember the run that I mentioned to you and you were going to do it with the kid from the patio? That they were going to start sending me the tracking so we can go pick up the tracking where they were supposed to arrive. That's the same thing with Wooppy; Wooppy explain to him more or less how the run is, that way he knows, because that's what I explained to him last time.
GARCIA 12/2/2023 11:47:42 PM	REPLY TO: No, is about the packages that I told you. Oh, alright, sounds good.
GARCIA 12/2/2023 11:47:58 PM	I arrived already.
ROMAN 39945589-8cdb-4863-8e0a-8a9f46d193a4.opus 12/2/2023 11:48:09 PM	Listen to what is up, bro. I have a Fed Ex generator; I have a Fed Ex generator. I have everything, the Fed Ex tracking. I generate the packages and we'll go and pick it up at the address. To tell you the truth, that's basically everything.
PAULA-CABRAL 12/2/2023 11:48:10 PM	Yes.
GARCIA 12/2/2023 11:48:21 PM	But nothing, get them clear, Goldo, we are active to do whatever and wherever.
GARCIA 12/2/2023 11:48:59 PM	So you let me know so we can do that right away. We are active.
ROMAN 12/2/2023 11:49:22 PM	I have 3.
ROMAN 12/2/2023 11:49:24 PM	Tracking.
ROMAN 12/2/2023 11:49:26 PM	For Monday.
ROMAN	There's a tracking

12/2/2023 11:49:30 PM	
ROMAN 12/2/2023 11:49:38 PM	It has 4 iPhone, 14 pro max.
GARCIA 12/2/2023 11:49:48 PM	Alright, hit me up so we can go and pick that up.
ROMAN 12/2/2023 11:49:51 PM	And the other one has two iPhones 15.
ROMAN 12/2/2023 11:50:08 PM	I'm going to see if I can get another car.
ROMAN 12/2/2023 11:50:13 PM	For us to pick that up.
ROMAN 12/2/2023 11:50:18 PM	Those two locations.
PAULA-CABRAL 12/2/2023 11:50:33 PM	Of course.
PAULA-CABRAL 12/2/2023 11:51:00 PM	And we have to find a few cold places.
ROMAN 12/2/2023 11:51:09 PM	New Hampshire.
ROMAN 12/2/2023 11:51:11 PM	Is cold.
ROMAN 12/2/2023 11:51:17 PM	But let's go pick it up this week.
ROMAN 12/2/2023 11:51:24 PM	We'll make a good profit.
ROMAN 12/2/2023 11:51:28 PM	And we go far.
ROMAN 12/2/2023 11:51:33 PM	I want to go to Ohio.
PAULA-CABRAL 12/2/2023 11:51:46 PM	🏃‍♂️➡️⌚️
GARCIA 12/2/2023 11:51:50 PM	In this same car we can go pick up everything, and if we have to go very early and stay chilling up there, we'll do it.
GARCIA 12/2/2023 11:52:14 PM	REPLY TO: I want to go to Ohio.] Hey, we are active for whatever, you just have to let us know what's up.
ROMAN 12/2/2023 11:52:46 PM	REPLY TO: In this same car we can go pick up everything, and if we have to go very early and stay chilling up there, we'll do it.] Sounds good. It's me Whoopy in case you think it's someone else.
ROMAN	Monday.

12/2/2023 11:52:48 PM	
ROMAN 12/2/2023 11:52:50 PM	We'll be picking up.
ROMAN 12/2/2023 11:52:54 PM	God willing.
ROMAN 12/2/2023 11:52:59 PM	Tomorrow we'll coordinate code.
PAULA-CABRAL 12/2/2023 11:53:01 PM	Bambino and what's up with El Py?
GARCIA 12/2/2023 11:53:18 PM	I'm clear about what's up. 🎉🎉
GARCIA 12/2/2023 11:53:37 PM	That's for sure, God willing.
GARCIA 12/2/2023 11:53:43 PM	[REPLY TO: Bambino and what's up with El Py?] He is here driving.
ROMAN 12/2/2023 11:53:46 PM	We need to work for the money for the gifts. 😊❤️🎁
GARCIA 12/2/2023 11:54:00 PM	Hahaha nbs.
PAULA-CABRAL 12/2/2023 11:55:46 PM	God willing; God will guide us.
ROMAN 8ce62b20-7d9e-4a61-bb28-1274e5731dca.opus 12/2/2023 11:56:07 PM	Gordo, so we already set up everything with the guys then. Everything is set up with them. We are going to pick up [STAMMERS] those two locations on Monday.
GARCIA 12/2/2023 11:56:15 PM	Uh-huh. You came to us and god as well.
PAULA-CABRAL	I already called NH.
PAULA-CABRAL 12/3/2023 12:10:59 AM	I'll create the group a little later.
ROMAN 12/3/2023 12:11:48 AM	Sounds good.
ROMAN 12/7/2023 3:06:03 AM	Active.
ROMAN 12/7/2023 3:06:05 AM	Work.
ROMAN 12/7/2023 3:06:06 AM	For tomorrow.
DARWIN BATISTA 15fbc46d-1715-4719-8090-a800a09d311f.opus 12/7/2023 3:22:57 AM	What's up? But we are active; we are just waiting on you. What's up? What's up? What's up? What's up?
ROMAN 12/7/2023 3:39:53 AM	I'm going to send you everything now
DARWIN BATISTA	Cool.

ROMAN 12/7/2023 3:48:08 AM	717853020414 [VICTIM NAME: CM] IP15 28GB BL 21 [STREET NAME] AVE WOBURN MA 01801 REQUIRES SIGNATURE
ROMAN 12/7/2023 3:48:21 AM	You know how...
ROMAN 12/7/2023 3:48:23 AM	...to get everything.
ROMAN 12/7/2023 3:48:29 AM	And how to put the tracking and all.
DARWIN BATISTA 12/7/2023 3:51:42 AM	Yes.
ROMAN 12/7/2023 3:51:54 AM	Call me.
DARWIN BATISTA 12/7/2023 3:52:06 AM	Now?
ROMAN 12/7/2023 3:54:08 AM	Yes.

E. ACCOUNT FRAUD

457. I am aware through this investigation that ROMAN conducts numerous types of thefts and fraud, including bank fraud, package theft, credit card fraud, and account fraud. Often these frauds require third parties to be involved in the scheme, such as to order devices that will be reported stolen, provide personal identifying information to obtain fraudulent accounts, or to offer their bank accounts for fraudulent checks to be deposited. These involved third parties often have legitimate accounts and are paid a percentage by the person perpetrating the fraud.

458. For example, I am familiar with two audio messages sent by ROMAN in August 2022, through his Snapchat account to an individual that he appears to be soliciting to conduct an account fraud scheme to obtain cellular phones. A preliminary transcript of these audio messages follows:

ROMAN: So look, look what I do. Xfinity. If you have, if, if you have internet like with Xfinity, right? You can get, you can get phones. So what I do is, I get three phones under your account, right? Then, I report stolen. But no it's

not. After I report stolen, we get three more. Those three that we get, you know, I report stolen again because I do it through, through, through, through my computer. So yeah, after we report, after we report stolen, I just put like, we don't want like, we don't want that service no more.

....

The account from the phone is different on the internet. The phone, the phone's account, it's not gonna fuck up your internet account. You know what I mean?

Filename: chat~media v4~2022-08-10-22-32-41UTC~kelvinmo23~iamsashablack....

ROMAN: It's right there brother, but the only thing is, you cannot get more phones through that Xfinity anymore, but that's it. (0:10) But you want to have your internet still, like, it's not going to get fucked up or nothing.

Filename: chat~media v4~2022-08-10-22-33-09UTC~kelvinmo23~iamsashablack....

459. Investigators also located a Snapchat image sent by ROMAN where he appears to be recruiting for a phone account scam, consistent with the one described in the audio messages. In the image, he requests individuals over the age of 18 and with identification to contact him, while he holds a stack of Apple iPhone boxes.



F. CONVENIENCE STORE BURGLARIES

460. Members of the Lynn Chapter of the Trinitarios also undertook a series of convenience store burglaries, where they would break in and steal lottery tickets. The Trinitarios would run the stolen tickets through phone-based applications to determine if the tickets were winners. The following morning the Trinitarios would then cash out the winning tickets at other convenience stores.

i. **2/27/2024, SWAMPSCOTT**

461. According to Swampscott Police Report #24013477, on February 27, 2024, at approximately 6:04 AM, Swampscott Police responded to 219 Paradise Road, Citgo Gas Station, for a report of a breaking and entering in progress. Upon arrival, officers observed the middle glass window of the business was broken and glass was scattered around it. Store personnel reported that Massachusetts scratch tickets had been stolen during the break-in.

462. Investigators were able to obtain video surveillance from inside the Citgo. The video shows one male approach the exterior glass window at approximately 5:06 AM, wearing a hoodie and mask. The individual removes a hammer from his jacket and proceeds to smash the window open and enters through the broken window. Another male immediately approaches the window, also with a hammer and enters. A third male stands outside the window briefly as a car appears to drive by and then enters through the same window. All three have their hoods up and their faces covered. They all immediately go to the area where the lottery tickets are kept and remove numerous tickets. They all leave through the same window they entered with the lottery tickets.

463. As part of the investigation, the Mass. Lottery Commission (the “Mass. Lottery”) informed investigators that approximately 307 lottery scratch tickets were stolen. Investigators learned there were several of the stolen lottery tickets cashed from approximately 6:14 AM to 7:49 AM on the morning of the burglary. All the locations were in the city of Lynn, MA. The Mass. Lottery also provided a list of the tickets reported stolen as well as a detailed list of tickets cashed, location they were cashed, and exact time they were cashed. Officers went to all the locations of the tickets being cashed to retrieve video surveillance at the following locations:

- a. Lynn Fuel, located at 512 Chestnut Street, Lynn, MA
- b. Southland Food Shop, located at 70 Market Street, Lynn, MA

- c. A to Z Convenience, located at 264 Essex Street, Lynn, MA
- d. 7-Eleven, located at 9 Austin Square, Lynn, MA
- e. Commercial Market, located at 105 Commercial Street, Lynn, MA

464. Review of the surveillance video showed the following:

- a. Video from Commercial Market showed an individual identified by investigators to be DAVID GARCIA exiting a Kia automobile and entering the store (image below). GARCIA is also seen in possession of some of the above referenced stolen lottery tickets, taking them to the counter, cashing them, and receiving payment (image below). Also visible in the Commercial Market footage was an individual identified to be ABEL SEVERINO REYES, who exited a black Kia Soul and walked into the convenience store with a scratch ticket in his hand. ABEL SEVERINO REYES is also observed taking the scratch ticket to the counter, cashing it, and receiving payment.



- b. Video from Lynn Fuel showed GARCIA in possession of the stolen lottery tickets. GARCIA can be observed taking the stolen tickets to the counter, cashing them, and receiving payment.



- c. Video from 7-Eleven showed GARCIA in possession of stolen lottery tickets, taking them to the counter, cashing them, and receiving payment.

ii. 3/2/2024, SAUGUS

465. According to Saugus Police Report #24-317, on March 2, 2024, at approximately 4:12 AM, Saugus Police were notified that the front window to the Richdale Convenience Store at 306 Lincoln Avenue was smashed. Upon arrival officers saw that the far-right window was smashed in the area behind the cash register. The store owner reported that multiple rolls of scratch tickets had been taken as well as packs of cigarettes.

466. A review of footage from the surveillance system showed that two suspects broke into the store at 3:18 AM. The first suspect was wearing a gray/black jacket with a white logo (believed to be North Face) and black pants. The second suspect was wearing all black with white sneakers. Both suspects were wearing hoods and masks. There was a dark colored vehicle observed circling the area during the incident.

467. On or about March 15, 2024, investigators responded to the Cogliano Plaza and obtained surveillance video of the two males involved in the break and a Kia Soul involved. The Mass. Lottery reported that fifteen books of lottery tickets were reported stolen from the Richdale

Convenience Store. The Mass. Lottery confirmed that the stolen books had been shut down, but that some of the stolen tickets were cashed before they could actively shut them down. The Mass. Lottery provided a printout of the stolen tickets being cashed between 5:58 AM and 7:02 AM on the morning of the burglary, at the following locations:

- a. 7-Eleven, located at 23 Newbury Street, Peabody, MA
- b. J & H Auto & Truck, located at 129 Newbury Street, Peabody, MA
- c. Route 114 Sunoco, located at 140 Andover Street, Danvers, MA
- d. A One Market, located at 50 Central Street, Peabody, MA
- e. Spiros Energy, located at 525 Lynn Way, Lynn, MA

468. The Mass. Lottery also informed investigators that the lottery has an application that you can download onto any mobile device that can be used to scan tickets in order to see if they are winners. Investigators were informed that to download the application and use the application that you need to create a user profile and provide information. The Mass. Lottery was able to confirm that on the morning of the Saugus break-in at Richdale, WESTYN LANTIGUA scanned the stolen lottery tickets through the mobile phone application.

469. Investigators obtained and reviewed the surveillance video from the locations in which the stolen lottery tickets were cashed.

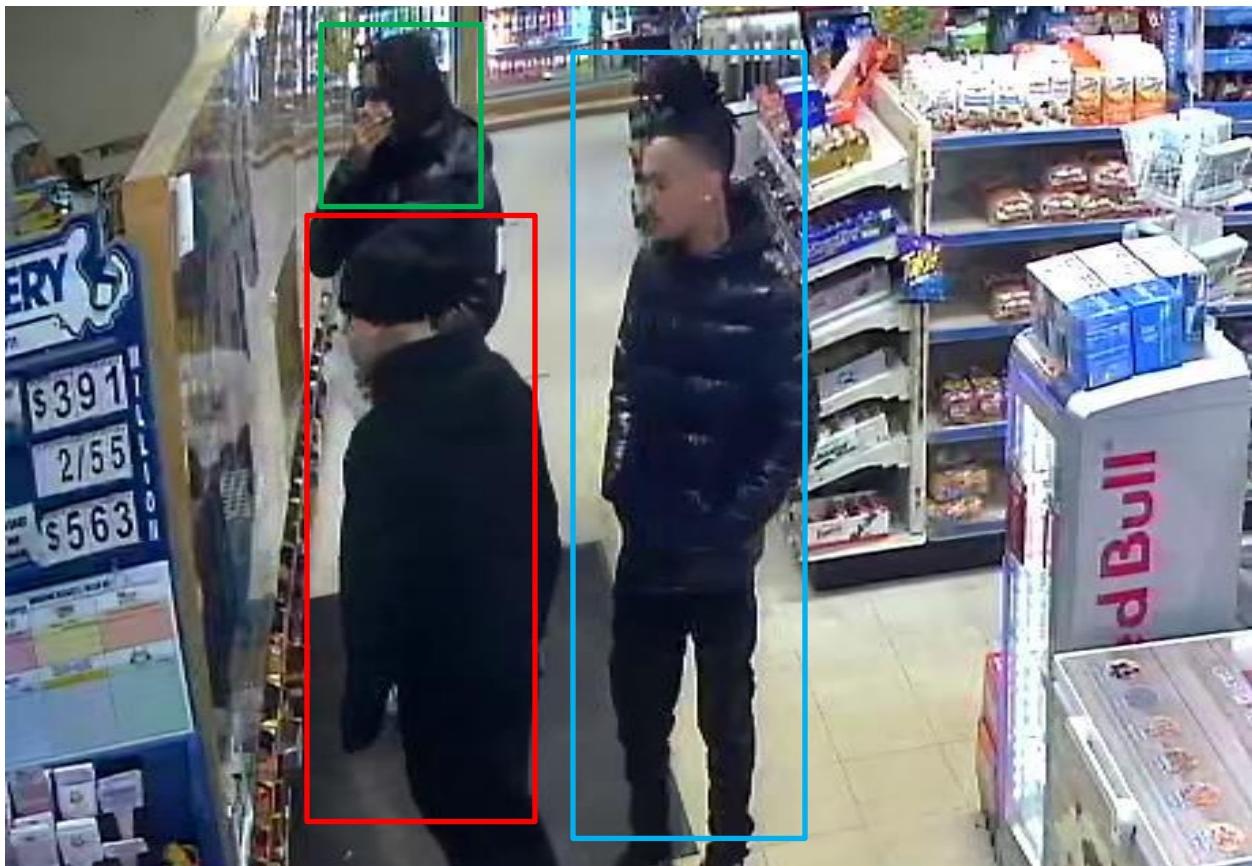
- a. At 7-Eleven, investigators obtained surveillance video of LANTIGUA cashing the stolen scratch tickets. During the video, LANTIGUA can be observed holding a cellular phone in his hand.



- b. At J & H Auto & Truck, investigators obtained surveillance video of GARCIA cashing stolen lottery tickets. The same Kia Soul previously observed in the 7-Eleven video was also observed.



- c. At Route 114 Sunoco, investigators obtained surveillance video of the male and vehicle involved with cashing the stolen scratch tickets. The male was later identified to be DAVID GARCIA, and vehicle was identified to be the black Kia Soul. GARCIA and the Kia Soul are the same individual and vehicle visible in the video surveillance footage from J & H Auto & Truck.
- d. At A-One Market, investigators obtained surveillance video of GARCIA (outlined in blue), LANTIGUA (outlined in red), and SEVERINO REYES (outlined in green) entering the store and cashing stolen scratch tickets from the break at Richdale in Saugus. Additionally, a black Kia Soul was also observed.



iii. **3/6/2024, WAKEFIELD**

470. According to Wakefield Police Report #24-234, on March 6, 2024, at approximately 3:05 AM, Wakefield Police were dispatched to 222 Salem Street (Salem Variety Store) for a burglary alarm activation. Officers arrived on scene and observed a broken front

window. The owner arrived on scene and reported that multiple books of lottery tickets had been stolen.

471. Video surveillance from inside the store showed that approximately 2:59 AM, three individuals approached the front window and proceeded to break it. All three suspects entered through the broken window and immediately started taking lottery tickets off the wall. Two of them were seen taking them off the wall while the third suspect was holding a bag to put the tickets in. All three suspects appeared to be males and were wearing jackets with hoods, face masks and gloves. The three suspects were in the store for approximately 45-50 seconds before exiting through the same window.

472. The first suspect into the store is wearing dark pants, what appear to be Nike sneakers, a Reebok jacket that had a Reebok logo on the upper left chest and a patch on the left shoulder. This same type of coat was the same coat that SEVERINO REYES was identified wearing during a recent interaction with Lynn Police. The second suspect is wearing a Nike hooded type zip down jacket with zip front pockets, what appears to be the same sneakers as the first suspect and light-colored pants. The third suspect is wearing a dark colored puffer type jacket and light-colored pants. The suspects then leave the store and head back towards New Salem Street.

473. A camera located at 132 New Salem Street captures a small sedan in the area at approximately 2:55 AM. The vehicle appears to have a high back and running lights that run up the sides towards the top of the vehicle. The vehicle is then seen heading away from Salem Variety at approximately 3:01 AM on New Salem and taking a left-hand turn onto Butler Avenue. This is consistent with the time the suspects were inside of Salem Variety. The vehicle seen in the New Salem Street video was consistent with a dark Kia Soul.

474. The Mass. Lottery queried the lottery ticket book numbers that were stolen from the Salem Variety Store in Wakefield. The Mass. Lottery provided information to investigators that the stolen ticket books had been queried on the Lottery Mobile Phone application by a user named WESTYN LANTIGUA. The Mass. Lottery also informed investigators that several of the stolen tickets were cashed at 7-Elevens in Lynn and Saugus as well as the Mobil Mart in Saugus.

475. Investigators obtained surveillance from the Mobil Mart, in Saugus, MA. In the surveillance video, a Hispanic male with a tattoo on his left neck wearing a black hat with an emblem on the center, black hooded sweatshirt, red shirt underneath, light colored pants, and black sneakers with white laces is seen entering the store at approximately 6:25 AM on March 6, 2024. This male was identified to be LANTIGUA. LANTIGUA cashes the lottery tickets from the Wakefield break. In the video, LANTIGUA exits what appears to be a black Kia Soul before entering the store.

476. Investigators obtained surveillance video from: the 7-Eleven in Saugus, MA; the 7-Eleven in Lynn, MA; and a Mobil Mart in Saugus, MA, where stolen tickets were cashed. In the surveillance videos, LANTIGUA and GARCIA can be seen entering and cashing the stolen lottery tickets.



iv. 3/6/2024, PEABODY

477. On March 6, 2024, at approximately 3:57 AM, Peabody Police were dispatched to the A-One Market located at 50 Central Street for a front door motion alarm. Officers noticed that a window in the front of the store towards the left of the door was shattered. Officers further observed that the cash registers were opened and lottery tickets had been ripped off the walls and were missing. Upon entering the store, a hammer was located behind the cash register on the floor. Multiple lottery tickets were reported stolen.

478. Video surveillance from inside the store depicted three male suspects wearing masks and gloves approach the store. One of the males uses the hammer to smash the window. Two of them then enter the store through the window and steal lottery tickets, while the third male waits outside. Surveillance video also captured the same Kia Soul in the area of the burglary, approximately six minutes prior to the break-in at the A-One Market.

479. The Mass. Lottery informed investigators that the tickets that were stolen from Peabody were scanned on the mobile phone application by the account associated with the username WESTYN LANTIGUA. None of the stolen tickets were able to be cashed, because the Mass. Lottery was notified in time to flag the tickets in their system.

v. 3/6/2024, LANTIGUA PHONE

480. Investigators located a video file on LANTIGUA's cellular phone that was created on March 6, 2024, at 11:36 AM (IMG_4049.mov). In the video, LANTIGUA flashes a large amount of cash and displays a large number of scratch tickets. These tickets appear to be consistent with the types of scratch tickets that were stolen. LANTIGUA's voice can be heard on the video. Still images from the video follow:



vi. **3/13/2024, MARBLEHEAD**

481. According to Marblehead Police Report #24-334, on March 13, 2024, at approximately 3:49 AM, police responded to an alarm call at the Richdale Convenience Store in Marblehead. Officers arrived and observed the front window to the left of the door to be smashed and broken glass on the pavement. The owner reported that lottery tickets had been stolen. Surveillance video showed two individuals involved in the burglary.

482. The Mass. Lottery reported that the stolen tickets had been cashed at several stores in Everett and Peabody later in the morning on March 13, 2024. The Mass. Lottery told

investigators that an account associated with the name WESTYN LANTIGUA scanned the tickets prior to them being cashed on March 13, 2024.

483. Surveillance footage from J&H Auto & Truck and 7-Eleven depicted LANTIGUA cashing stolen tickets. Surveillance footage from TDZ Mobil Mart depicted GARCIA cashing stolen tickets. Still images follow:





vii. **3/19/2024, SEABROOK, NH**

484. According to Seabrook Police Report #24-299-OF, on Tuesday March 19, 2024, at approximately 3:57 AM, three males broke into the Richdale Convenience Store located at 472 Lafayette Road in Seabrook, NH. They gained access through a front window by using a large set of bolt cutters to smash the window. Two males entered the store and stole a plastic container filled with 43 rolls of different scratch tickets, while a third remained outside to be a look out. The three males were in and out of the establishment in roughly 20 seconds. The value of the stolen tickets was approximately \$5,300.

485. Video surveillance revealed that the three males ran down the street and fled in a vehicle. The vehicle was then tracked on different video surveillance systems in the area travelling northbound on Route 1 and then westbound on Route 107. It appeared to be a dark colored newer sedan or small SUV.

486. Detectives were later notified by NH Lottery Commission that several of these stolen lottery tickets had been cashed on two separate occasions (10:50 AM and 12:40 PM that day) at the Hannaford in Exeter, NH, and the most recent transaction was approximately 4:30 PM. Video surveillance and interviews with employees resulted in locating the 4 male subjects and an associated BMW. Video surveillance captured GARCIA, LANTIGUA, ANGEL SANTOS and ISRAEL GARCIA VASQUEZ cashing lottery tickets on March 19, 2024, from the Seabrook, NH, Richdale Convenience Store. Still images follow, depicting SANTOS and GARCIA VASQUEZ in the first image, and LANTIGUA and GARCIA in the second image.



viii. 3/21/2024, MERRIMACK, NH

487. According to Merrimack NH Police Report #24-005307, officers responded to a break-in at the Lucky Discount Mart in Merrimack, NH. Officers observed a broken window at the front of the business and were informed by store personnel that over \$9,578 worth of lottery

tickets had been stolen, along with over \$2,220 in cash and other items. Surveillance footage revealed that the break-in took place at 4:07 AM and four suspects were involved.

488. Lottery personnel informed investigators that the tickets had been cashed at seven stores in the New Hampshire area, including:

- Hannaford's 859 Hanover St Manchester, NH
- Hannaford's 201 John Devine Dr Manchester, NH
- Market Basket 460 Elm St Manchester, NH
- Market Basket 539 Donald St Bedford, NH
- 7/11 85 S. Main St Manchester, NH
- Market Basket 30 Market St, Hooksett, NH
- Quality Fuel Mart 30 Market Dr, Manchester, NH
- Gulf Station 21 North Main St, Manchester, NH

489. Video surveillance showed SANTOS, LANTIGUA and GARCIA cashing the stolen lottery tickets.







ix. 3/23/2024, WINDHAM NH

490. According to Windham Police Report #24-115, on March 23, 2024, the Howie Glynn & Son convenience store was burglarized. Officers observed the front window had been

smashed. Store personnel reported that numerous lottery tickets had been stolen. Surveillance video showed that two suspects committed the burglary at approximately 3:40 AM.

491. The NH State lottery identified the stolen lottery tickets as having been cashed at the following stores:

- Hannaford - 175 Coliseum Ave, Nashua, NH - store #8186
- Market Basket - 375 Amherst St. Nashua, NH - store #43
- Market Basket - 34 Northwest Blvd. Nashua, NH - store #39
- Hannaford - 77 Derry Rd. Hudson, NH - store #8183

x. 3/25/2024, NASHUA, NH

492. According to Nashua Police Report #24-17967, on March 25, 2024, at approximately 2:50 AM, the Citgo located at 159 Amherst Street in Nashua, NH was burglarized. During the break-in, lottery tickets were stolen. According to the NH Lottery Commission, the stolen tickets were cashed at Hannaford's Supermarket in Derry, NH, later that same day.

493. According to review of video surveillance from the Hannaford's, GARCIA VASQUEZ was identified as the individual who cashed the tickets. A still image from the service desk of the Hannaford's depicting GARCIA VASQUEZ cashing the stolen lottery tickets follows:



xi. 3/27/2024, FREMONT, NH

494. According to Fremont NH Police Report #24-FRE-51, on Wednesday, March 27, 2024, at 5:26 AM, a breaking and entering was reported at the Village Market located in Fremont, NH. Surveillance video depicted three males who broke into the store and stole lottery tickets. The tickets were valued at approximately \$4,587. According to the NH Lottery Commission, the stolen tickets were cashed at Hannaford's Supermarket in Derry, NH, later that same day.

495. At approximately 11:15 AM, LANTIGUA entered the Hannaford in Derry, NH, and cashed a series of tickets that had been stolen from the Village Market. LANTIGUA can be seen wearing black sweatpants and a black Nike sweatshirt, consistent with the clothing worn by one of the burglars. A still image of LANTIGUA holding the stolen lottery tickets follows:



xii. 3/29/2024, WINDHAM, NH & WILMINGTON, MA

496. According to Windham NH Police Report #24-118, on Friday, March 29, 2024, at approximately 4:14 hours, a breaking and entering was reported at the Engen Gas Station located at 132 North Lowell Road, in Windham, NH. During the burglary, lottery tickets were stolen that were valued over \$8,000. Surveillance video was obtained showing two males being involved in the break-in.

497. At the time, MSP investigators had installed a court-authorized GPS tracking device on a blue BMW utilized in the thefts. A review of the GPS tracking device data at the time of the breaking and entering showed that the court-authorized GPS affixed to the blue BMW was in the area of the Engen Gas Station. Investigators reviewed the location of a blue BMW via the GPS device which showed it to be on N. Lowell Road and Windham Road in Windham, New Hampshire from 4:01 AM to 4:14 AM hours on March 29, 2024. The blue BMW then traveled directly from Windham New Hampshire to the Hilton Garden Inn, 4 Highwood Drive in Tewksbury, MA.

498. According to Wilmington Police Report #24-357, on March 29, 2024, at 5:15 AM Elias Country Store in Wilmington, MA was broken into and the thieves stole lottery tickets. This grocery store was located across the street from the Hilton Garden Inn in Tewksbury, MA. The suspects left a trail of scratch tickets across the parking lot, along with latex gloves found nearby.

499. The tickets stolen from the Wilmington break-in were identified and flagged as stolen. Shortly thereafter, the Mass. Lottery provided information that the stolen tickets were attempted to be cashed at a Circle K store in Tewksbury, MA. LANTIGUA and GARCIA were later seen on surveillance video from the Circle K cashing the stolen lottery tickets later that morning. Still images of LANTIGUA and GARCIA attempting to cash the stolen tickets follow:



500. Investigators obtained surveillance video from the Hilton Garden Inn for March 29, 2024. Surveillance from the Hilton showed the blue BMW pull into the rear of the parking lot at 4:32 AM. At 5:41 AM, two males are seen at side entrance who were identified as DIAZ LIRANZO and DARWIN BATISTA. Both DIAZ LIRANZO and BATISTA have been stopped

by police prior to and after the break-in operating the same blue BMW. DIAZ LIRANZO appears to be hiding his right hand, which is covered with a tattoo, but has his left hand exposed, which has no documented tattoos. GARCIA, who has distinct tattoos, is observed opening the door for DIAZ LIRANZO and BATISTA.

501. At 5:32 AM on March 29, 2024, LANTIGUA can be observed on surveillance video at the check-in desk of the Hilton. At 6:12 AM on March 29, 2024, DIAZ LIRANZO can be observed on surveillance video at the check-in desk of the Hilton. Still images depicting LANTIGUA (first photograph) and DIAZ LIRANZO (second photograph) follow:



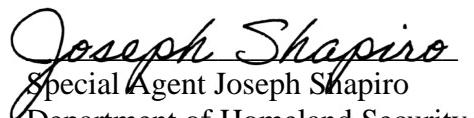
502. Investigators also learned the GPS tracking data that the BMW was at the Salem, NH Market Basket parking lot at approximately 8:55 AM. Investigators learned that individuals

attempted to cash in the stolen scratch tickets were turned away at the Market Basket. The BMW then returned to the Hilton Garden Hotel in Tewksbury.

VIII. CONCLUSION

Based on the foregoing, the Defendants charged in the above-referenced cases should be detained pending trial.

Signed and sworn under the penalties of perjury on February 19, 2025:



Special Agent Joseph Shapiro
Department of Homeland Security
Homeland Security Investigations

Operation Paper Machetes: Green Monster

